

**IN THE UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF PENNSYLVANIA**

**JAMES MICHAEL AMOR
PATRICIA ELVIRA ARMOR**
213 N. Kinzer Ave.
New Holland, PA 17557

Plaintiffs,

vs.

COURTNEY CONOVER
6522 Mason Cir
Randleman, NC 27317

Defendant.

NO. 21-5574

CIVIL ACTION

JURY TRIAL DEMANDED

PLAINTIFFS' PRETRIAL NARRATIVE STATEMENT

Plaintiffs, by and through their undersigned counsel, hereby files his Pretrial Narrative Statement.

A. BRIEF STATEMENT OF FACTS TO BE INTRODUCED AT TRIAL

This case involves the systematic and unrelenting defamation of the Plaintiffs by a relentless Defendant who has appointed herself the self-righteous advocate of alleged victims who she recklessly asserts, without any personal knowledge, suffered some kind of abuse by the Plaintiffs many years ago.

In pursuit of her self-appointed mission, she has authored articles, blogs, posted comments on social media and Facebook, accusing Dr. Amor and his wife of aiding and abetting pedophiles and/or rapists by refusing to take the claims of rape and sexual assault victims seriously and by retaliating against them. This retaliation, Defendant has asserted, includes but is not limited to

publicly humiliating the victims, calling them crazy, refusing to rehire them, and/or terminating them.

The case stems from Dr. Amor's employment as the Performance Entertainment Director of the Pittsburgh Renaissance Faire (Faire) in the Summers of 2020 and 2021. Defendant has unrepentantly testified that she wants to hurt Dr. Amor and his wife and if that involves the loss of Dr. Amor's dental practice, then so be it.

Defendant has continually represented that her accusations will be corroborated by others at trial. The Plaintiffs know this will not happen a trial because Defendant's allegations are false. It will become clear that Defendant is motivated by a malicious animus and Plaintiffs will request the jury to award punitive damages, in addition to the compensation set forth below.

Plaintiffs will testify to the falsity of Defendant's irresponsible and uncontrolled allegations. Defendant will be taken by the Plaintiffs to testify as on cross. Plaintiffs expect she will be unable to justify the viciousness she has published and the false light in which if she has cast the Plaintiffs.

Plaintiffs reserve the right to take any of Defendant's witnesses as on cross and, depending on the testimony may have the following witnesses testified as to the falsity of the events Defendant has so recklessly published.

B. STATEMENT OF DAMAGES CLAIMED

Plaintiffs are seeking the following damages:

- Legal Fees in excess of \$75000.
- Expenses related to the prosecution of this case are \$1,754.49 consisting of filing fees, deposition, and detective services to locate the Defendant.
- Pain and suffering in an amount to be determined by the jury.

- Lost Revenue. 150 of Dr. Amor's patients have a crossover to the Renaissance festival. Offers to purchase Dr. Amor's dental practice were dramatically withdrawn. Instead of selling for \$175,000, it instead sold for \$55,000 and Plaintiffs spent \$8500 emptying it of equipment which he was unable to sell.
- Dr. Amor had a revenue loss of \$25,000 from 2021- 2022 which he attributes to Defendant's defamation. Plaintiffs have attached an exhibit of a profit and loss statement from January through May 2022 it shows a loss of \$14,940.68
- Loss of income by Dr. Amor tracking and researching Defendant's defamatory publications when that time could have been spent in dentistry, as locum tenens at \$100 an hour. Dr. Amor calculates his loss at around \$36,000.
- Punitive damages in an amount to be determined by a jury.

C. WITNESS LIST

1. James Amor

Under the custody and control of Plaintiff's attorney. Will testify to the falsity of Defendant's defamatory publications and the damages he has suffered.

2. Patricia Amor

Under the custody and control of Plaintiff's attorney. Will testify to the falsity of Defendant's defamatory publications and the damages she has suffered.

3. Courtney Conover

As on Cross.

4. Lois Beidler: 3217 Stoudts Ferry Bridge Road, Reading, PA 19605

(610) 781 – 1256 iszadance@yahoo.com

Will testify as to the falsity of Defendant's publications.

5. Scott Walton:

225 Morewood Avenue, Blairsville, PA 15717 (724) 454-0205
scott.walton1@yahoo.com

Will testify as to the falsity of Defendant's publications

6. Randal Scott Lefkowitz:

212 Washington Street, Munhall, PA 15120

Will testify to his lack of knowledge regarding any sexual assault/rape

7. Leonard Miller:

189 Archertown Rd, New Egypt, NJ 08533 (215) 499-0105 tj_miller@hotmail.com

Will testify regarding the falsity of Defendant's publications

8. Chelsea Charlesworth:

310 Cedarhurst Avenue, N. Versailles, PA 15137 412-251-2236 chelseasweetpea@gmail.com

Will testify regarding the falsity of Defendant's publications.

9. Christine Manns

6810 Vera Drive Pittsburgh PA 15236 (412) 377-7300 clrauch@hotmail.com.

Will testify as to the falsity of Defendant's publications

Plaintiffs also reserve the right to call any witnesses listed by Defendant.

A. STIPULATIONS

None.

B. DEPOSITION DESIGNATIONS

All witnesses deposed are expected to be called live, barring an unavailability issue (no such issues are known to Plaintiffs at the time of this filing).

By way of disclosure Plaintiffs may use the following sections of Defendant's deposition. Page. 13: line 14 – page 59 line 9

LIST OF EXHIBITS

Plaintiffs also reserve the right to utilize any exhibits listed by Defendant. Plaintiffs reserve the right to seek to leave to amend this list to the extent consistent with the Federal Rules of Civil Procedure, the Local Rules of the United States District Court for Eastern District of Pennsylvania and the policies and procedures of this Court.

EXHIBIT 1

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 Courtney Conover

[Add Friend](#) [Message](#) [...](#)

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Intro

Works at Photography by Courtney Conover

Studied at Penn State World Campus

Studied at Penn Foster

Studied at Atlantic Cape Community College

Lives in Randleman, North Carolina

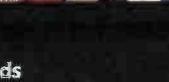
Photos [See All Photos](#)











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Courtney Conover is 🎉 feeling proud

55m

I don't care what you think of me for speaking up and telling the truth. I don't care if you go running to people and tattling. Please do. I don't care if you call me names and block me on social media.

The one thing I don't ever do, however, is LIE. There is a reason I know far more than I should (especially about private meetings no one else knew about) Because y'all have moles telling the truth behind the backs of those who hurt them, even when they're afraid to come out publicly with it. I'm not afraid. The truth will always matter more than any job or position of power. And regardless of who hates me for telling it, I'll always be truthful and against anyone being harmed.

If that bothers you, you are free to leave. I don't need people in my life who fight for and make excuses for those who hurt, abuse, and frighten others. If you do - get out. If you are the person taking these and showing them to an abuser, you're an accomplice to abuse, condone it, and I can't have that in people I know. Please leave.

[Like](#) [Comment](#)

Courtney Conover

I just deleted someone I know for a fact defends people who have abused others and remains friends with people who go around telling everyone they know how her husband is a predatory rapist himself. Yeah, if you're going to stay friends with people who do that, that probably means your husband is what they say. And if he is, defending other rapists would certainly be your M.O. Good riddance!

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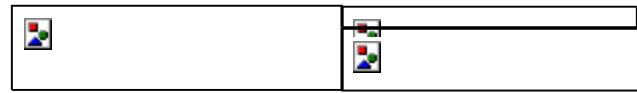
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 Courtney Conover

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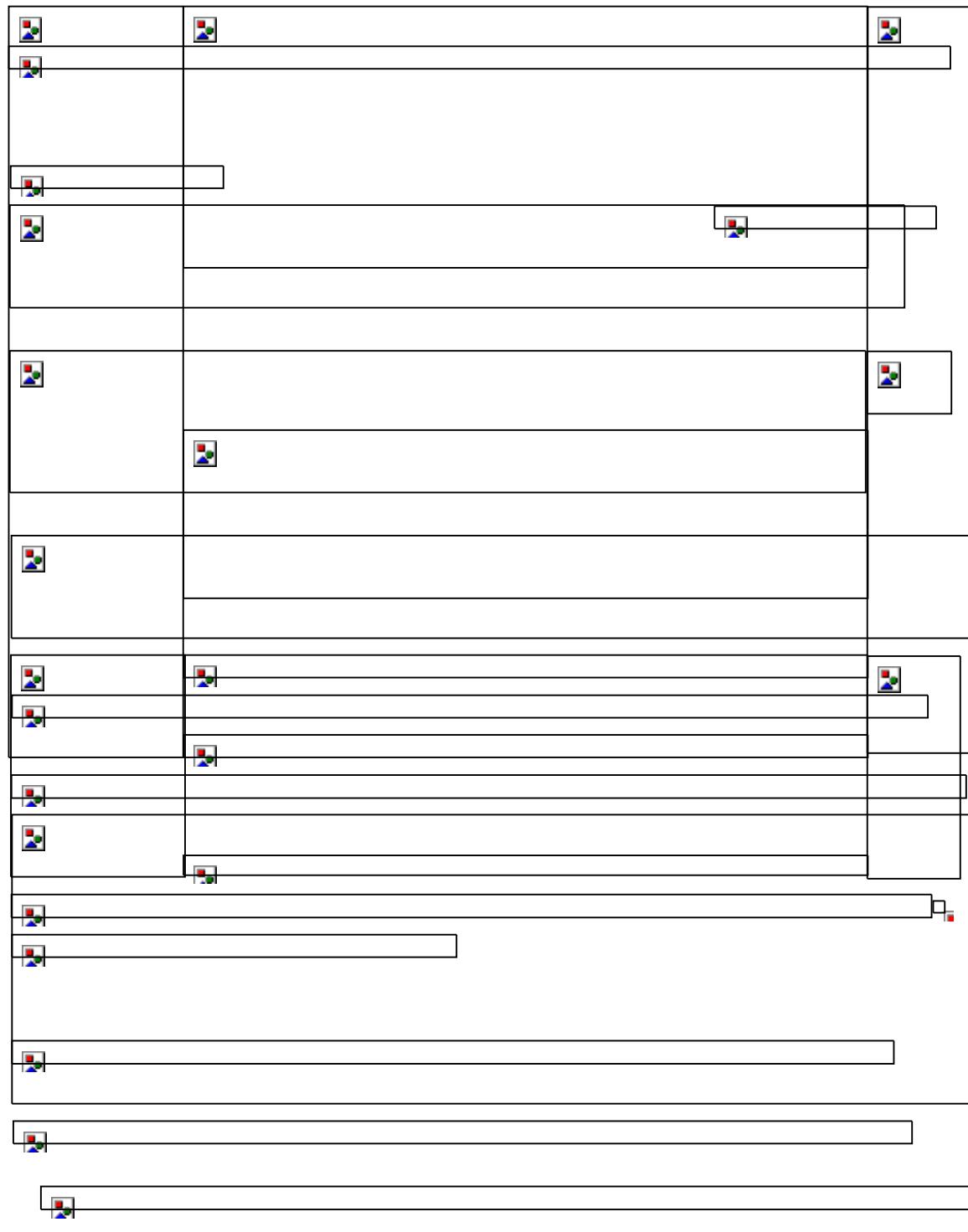
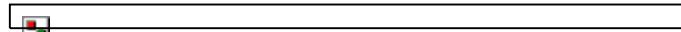
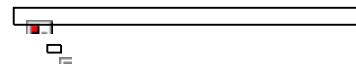
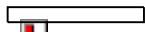
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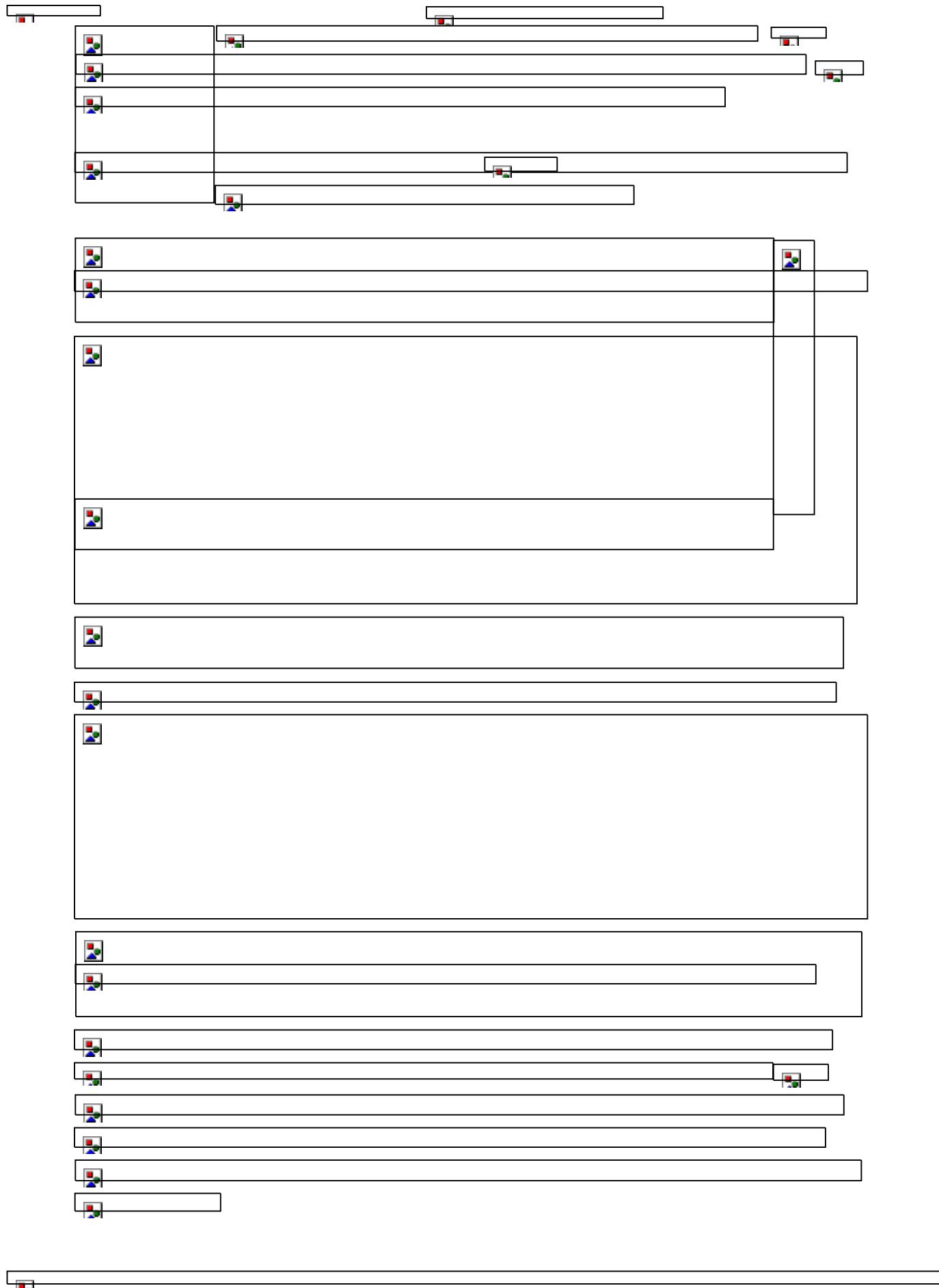
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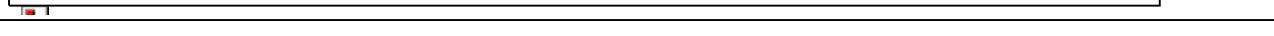
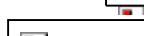
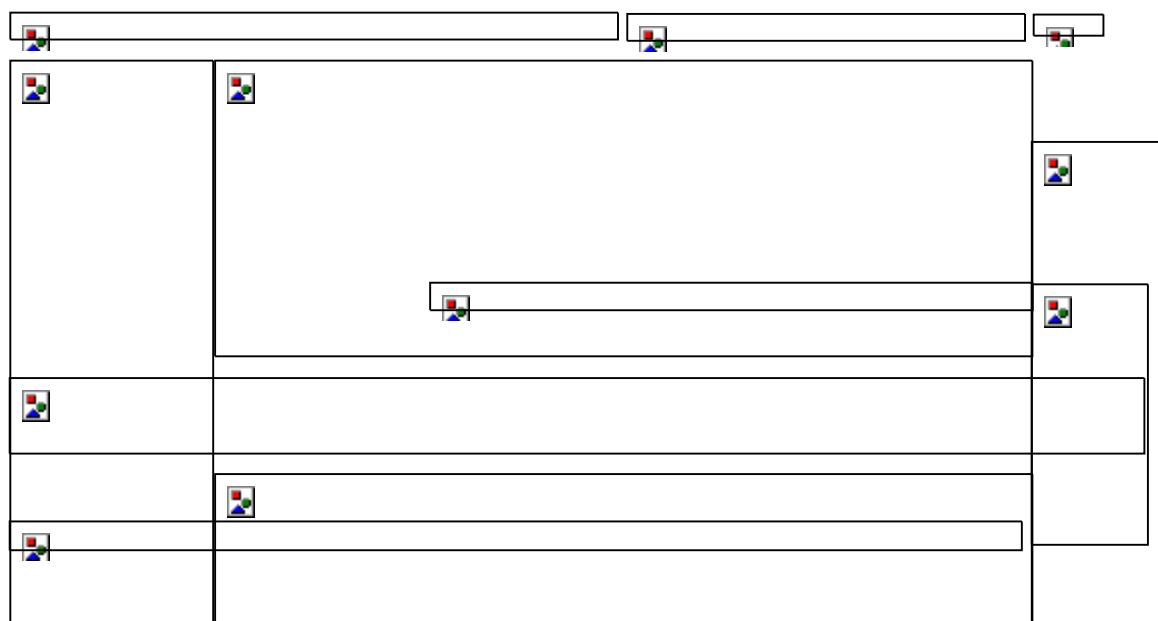
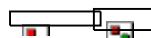
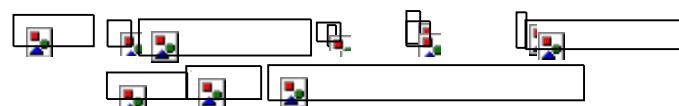
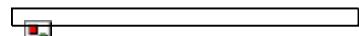
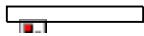
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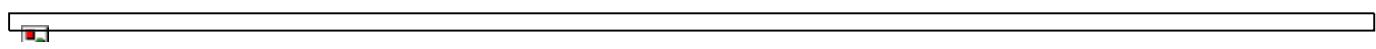
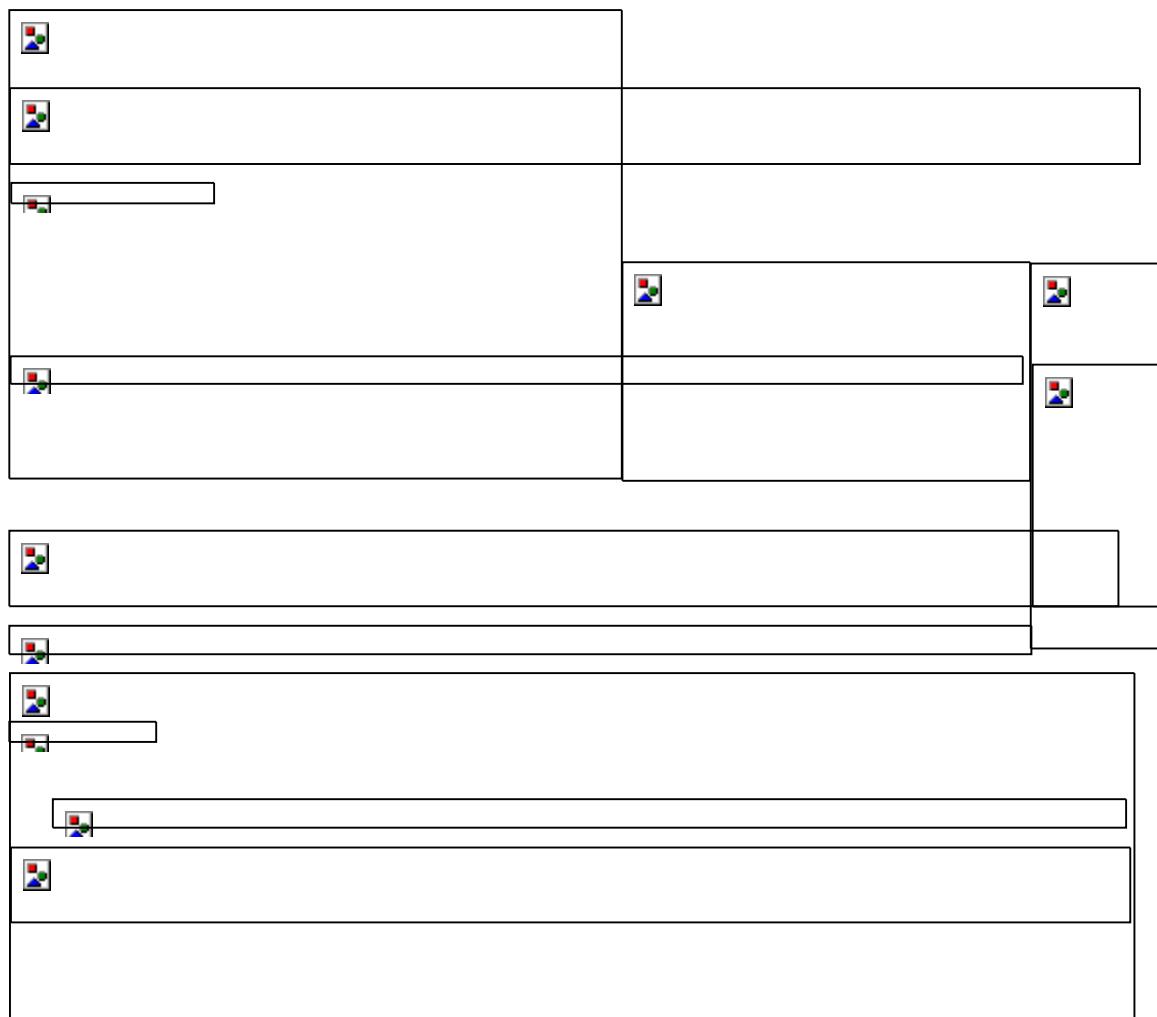
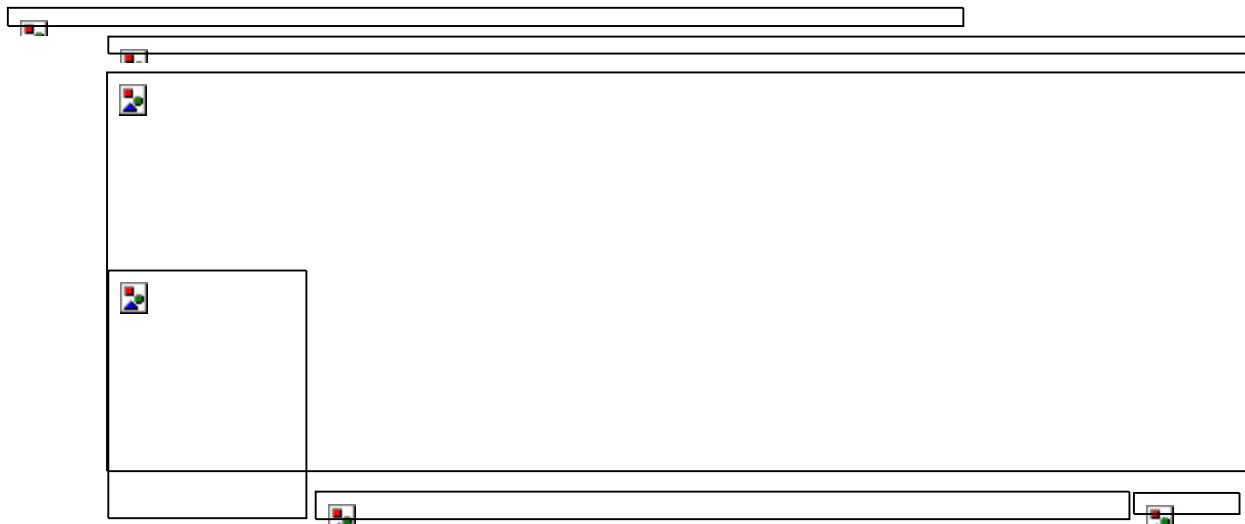
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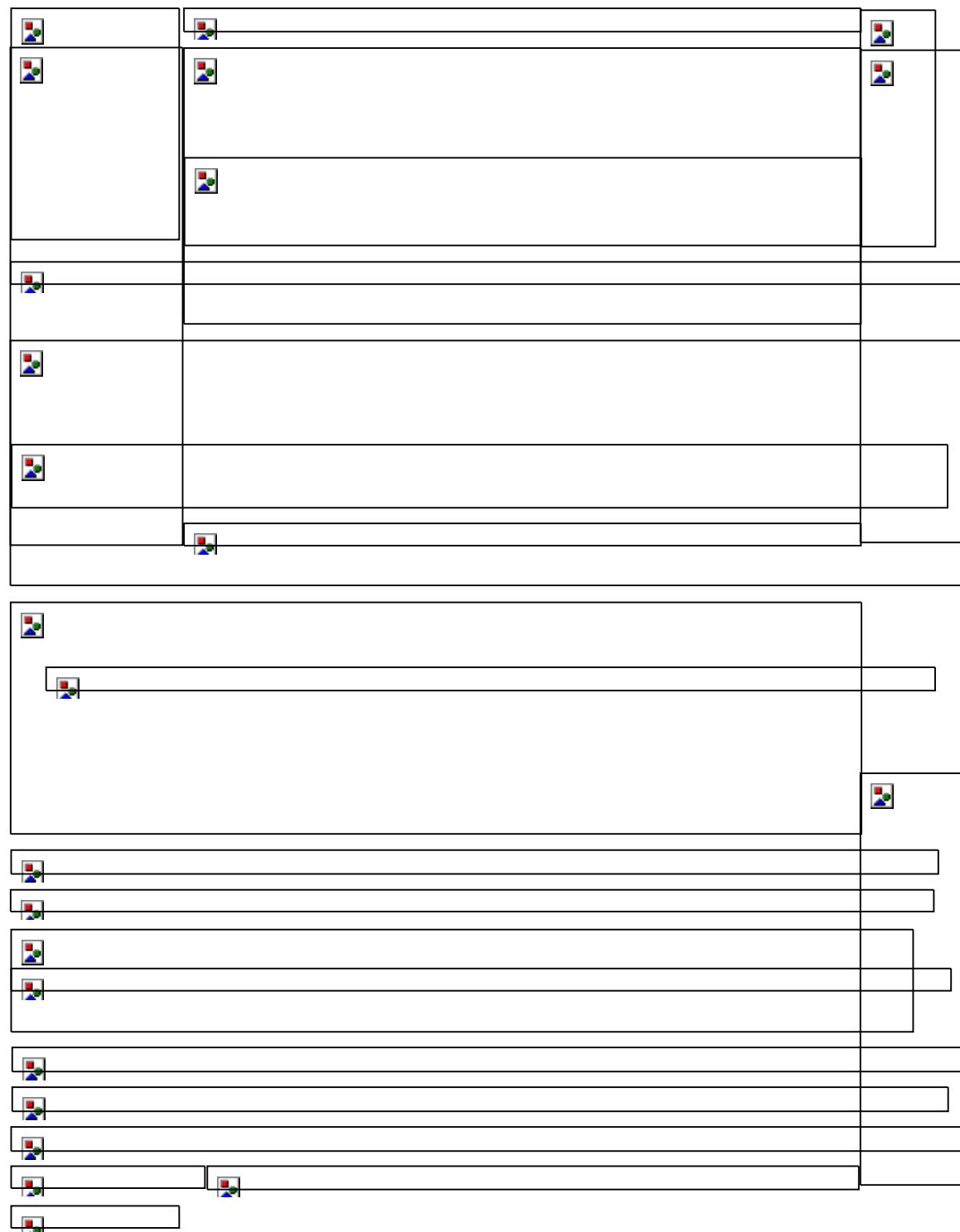


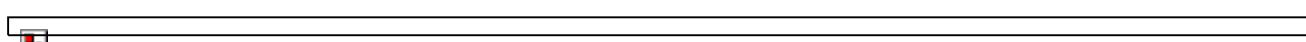
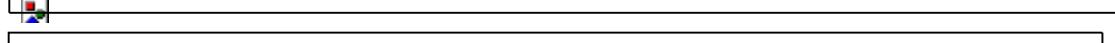
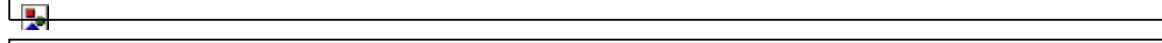
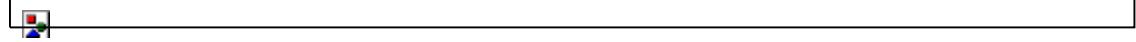
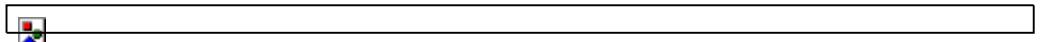
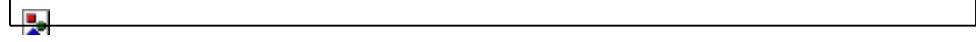
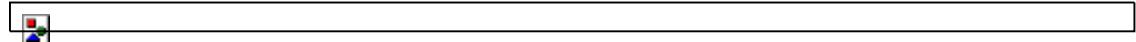
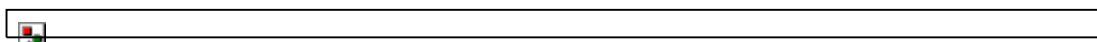
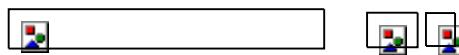
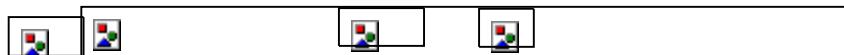
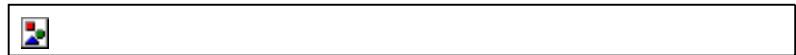
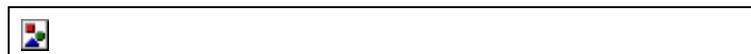
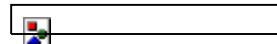
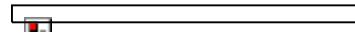
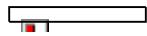
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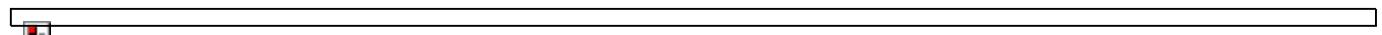
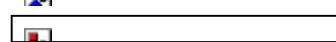
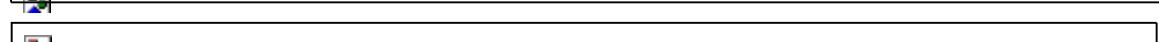
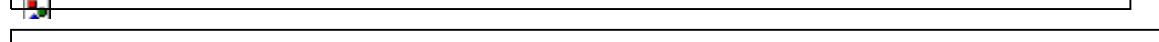
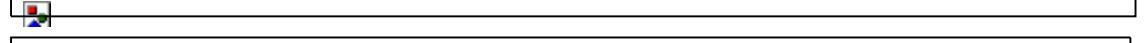
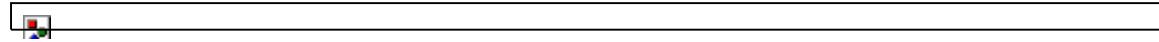
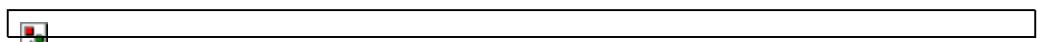
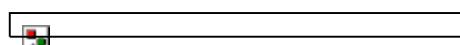
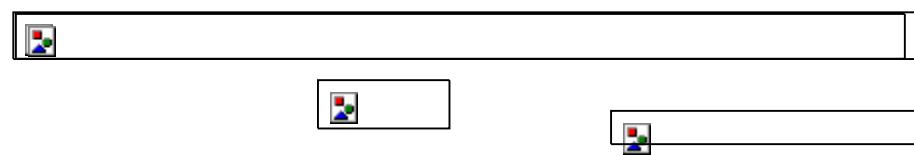
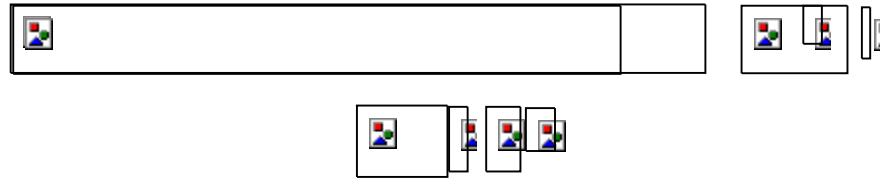
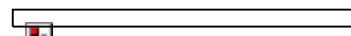
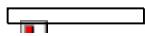
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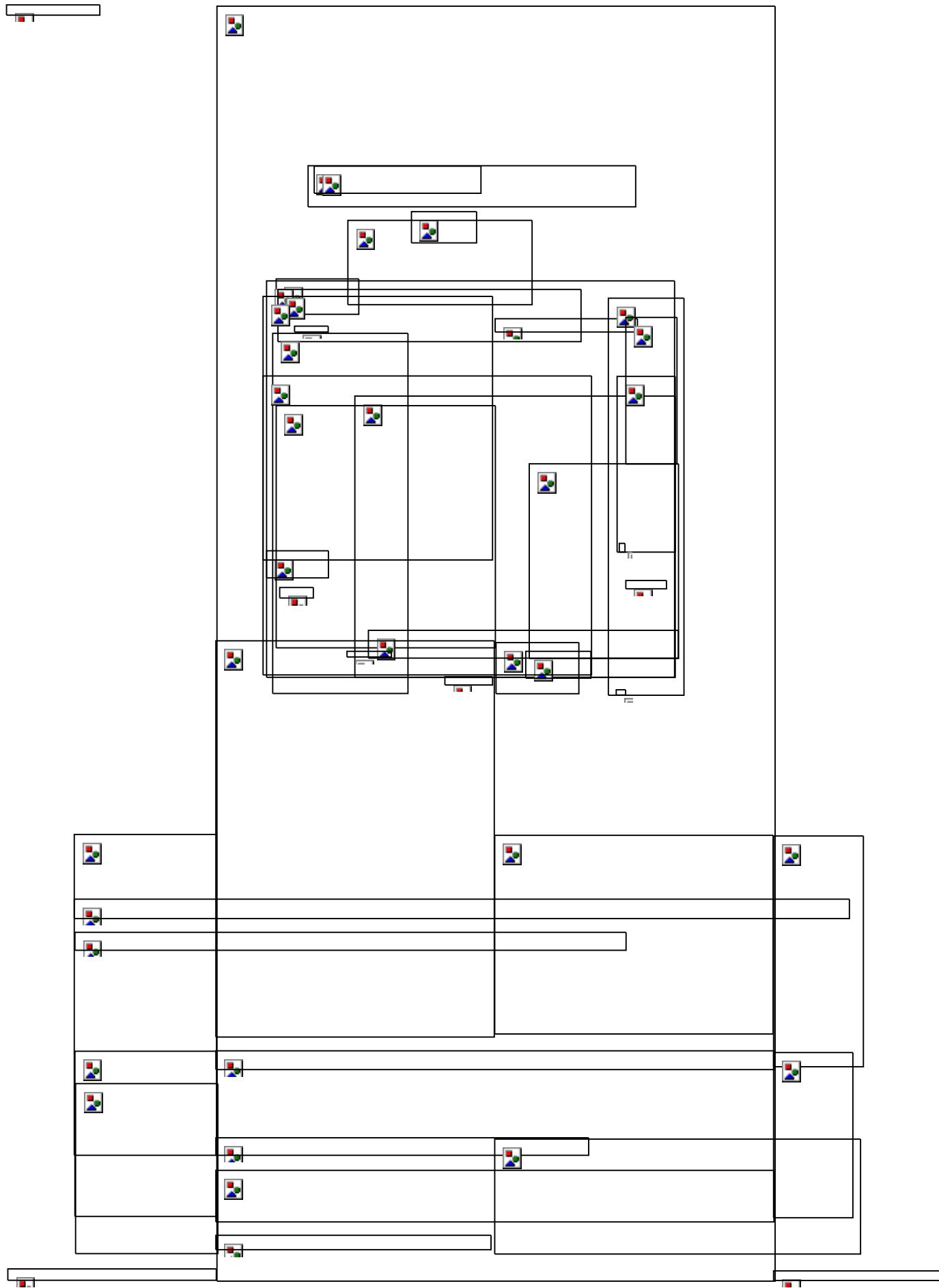


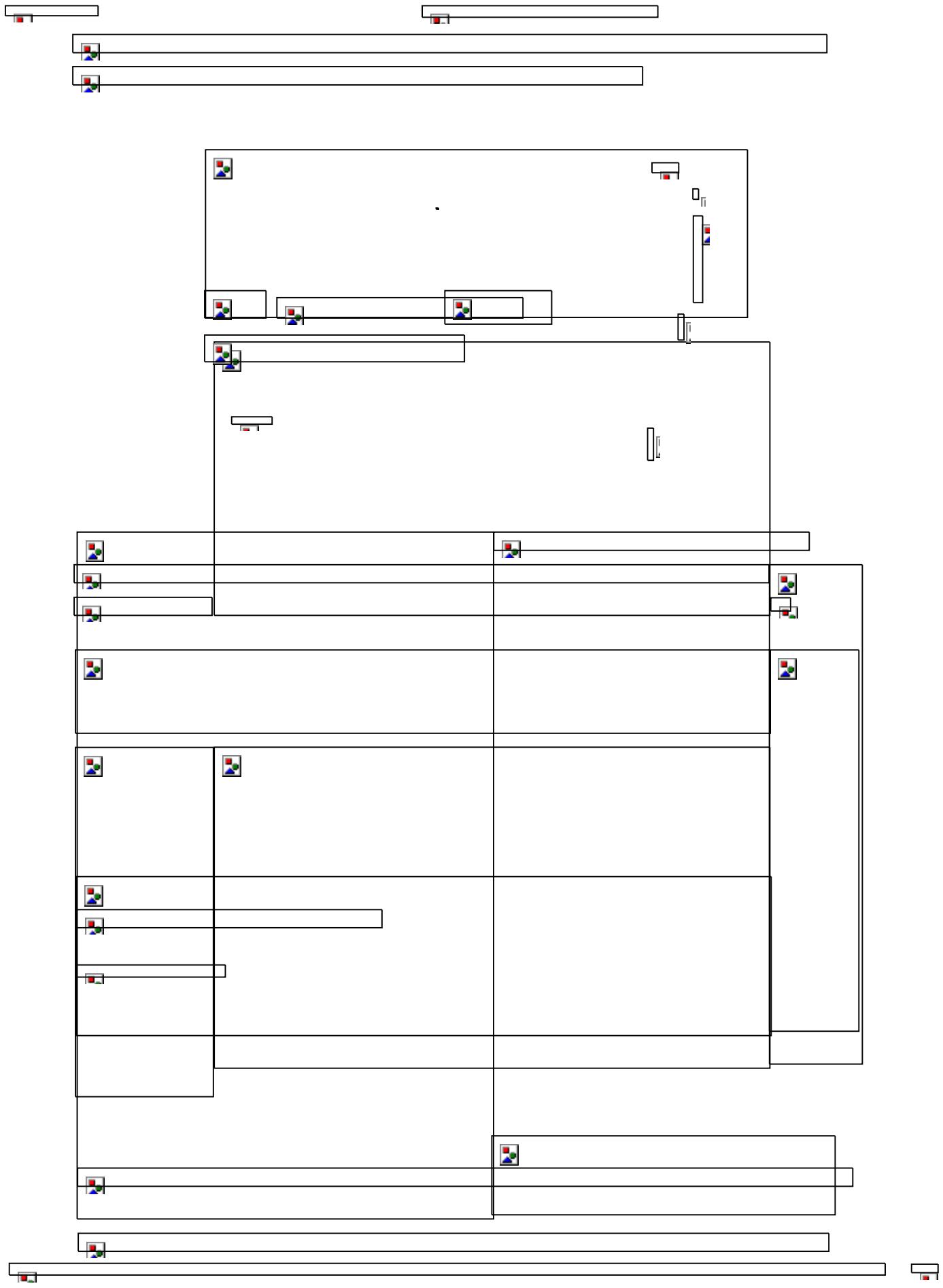
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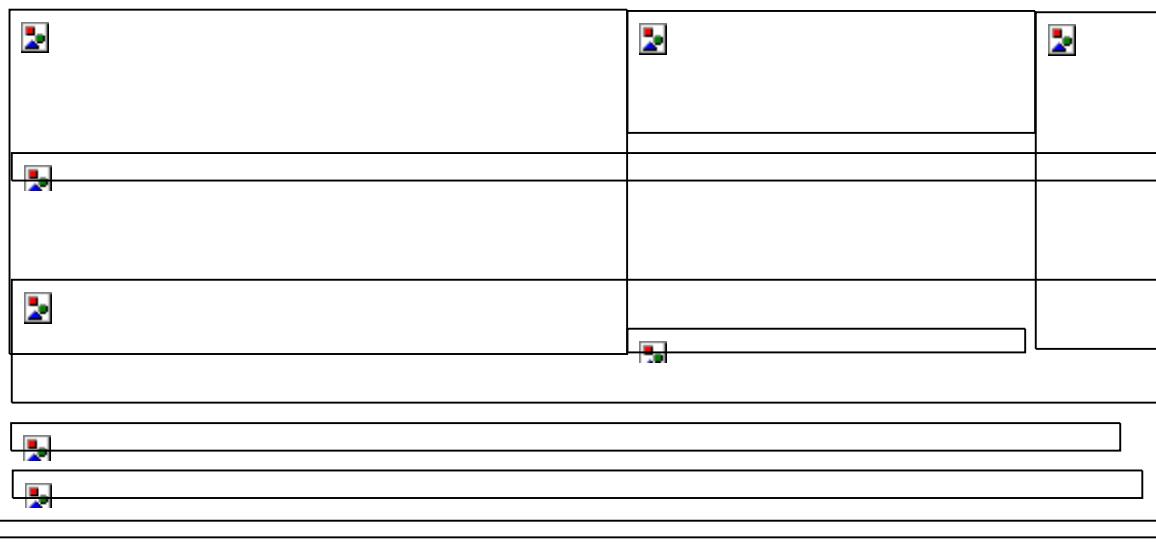
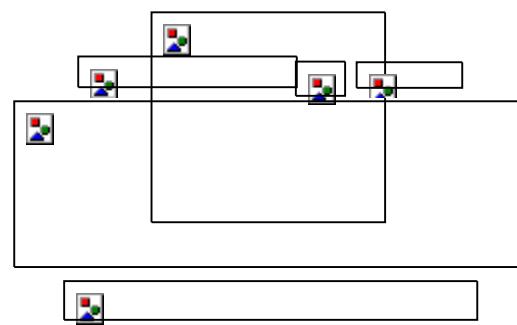
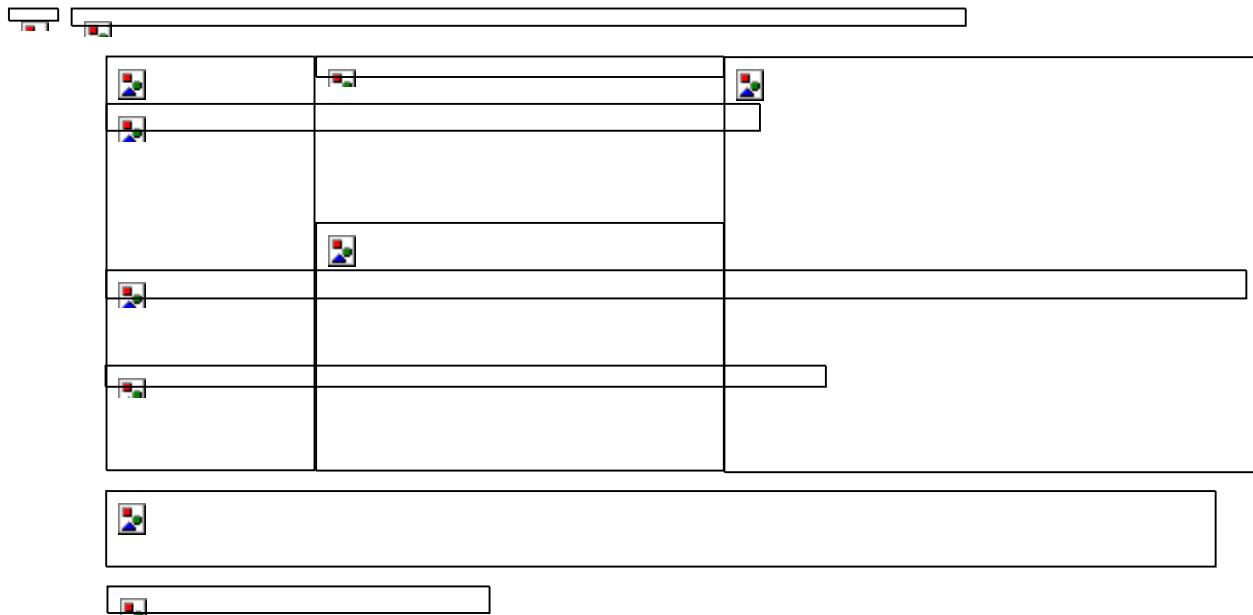












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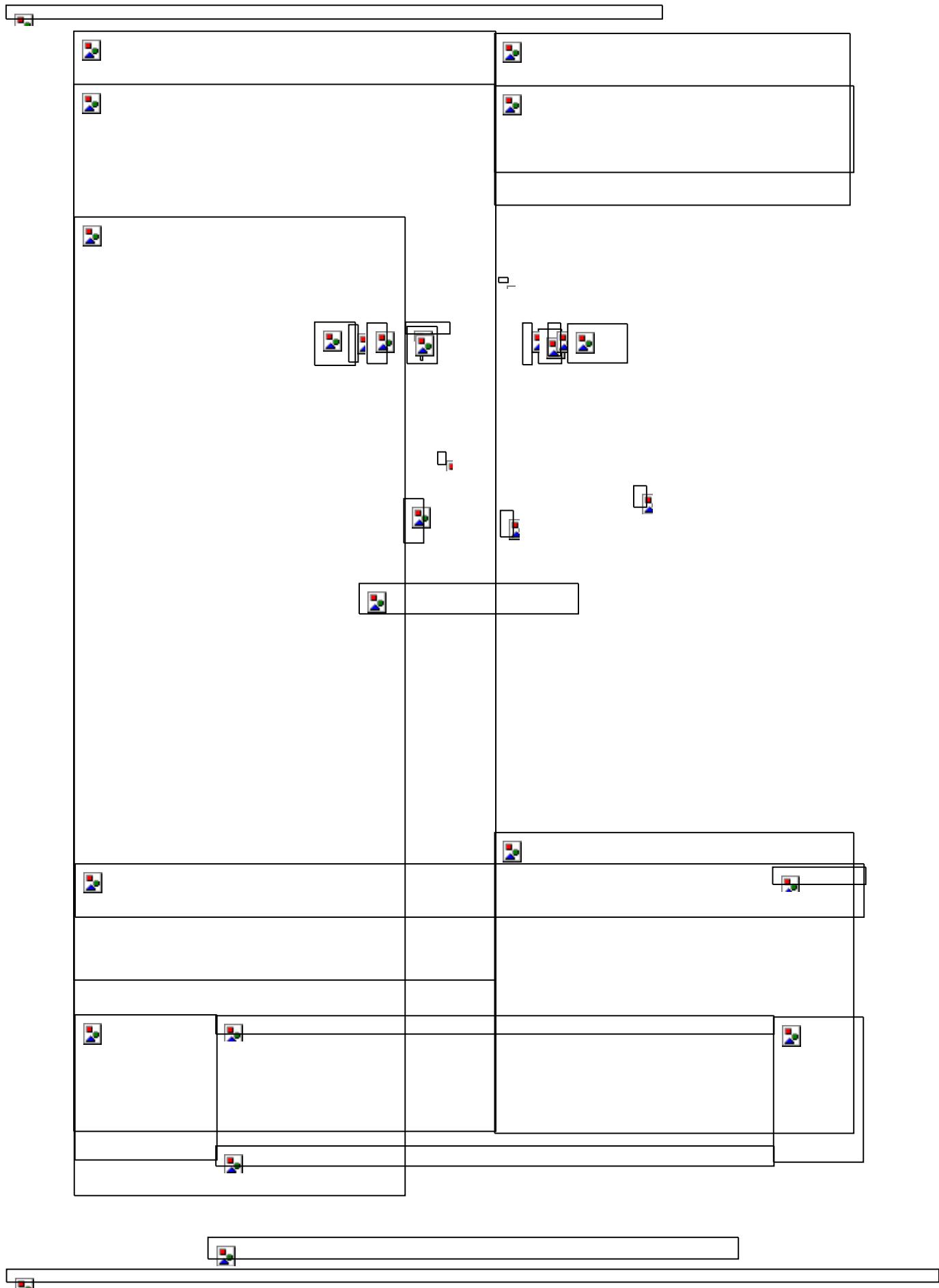
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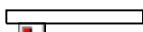
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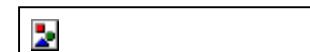
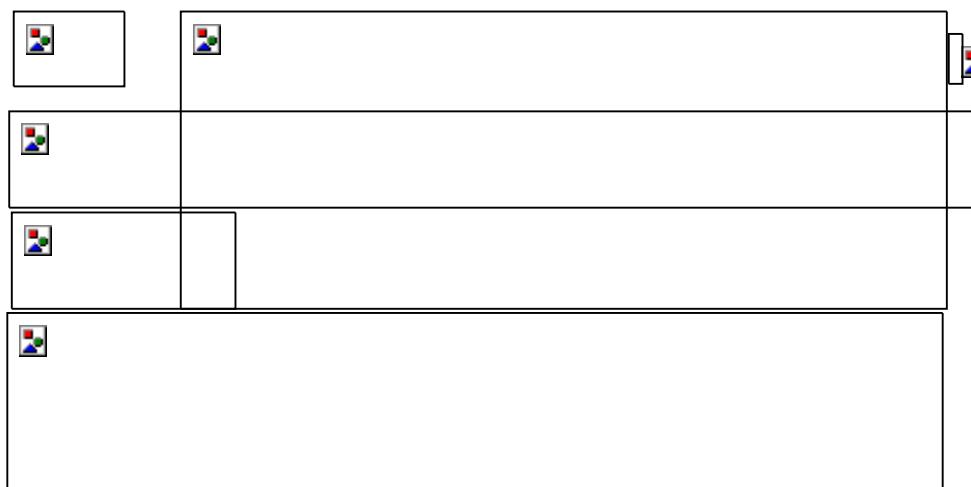
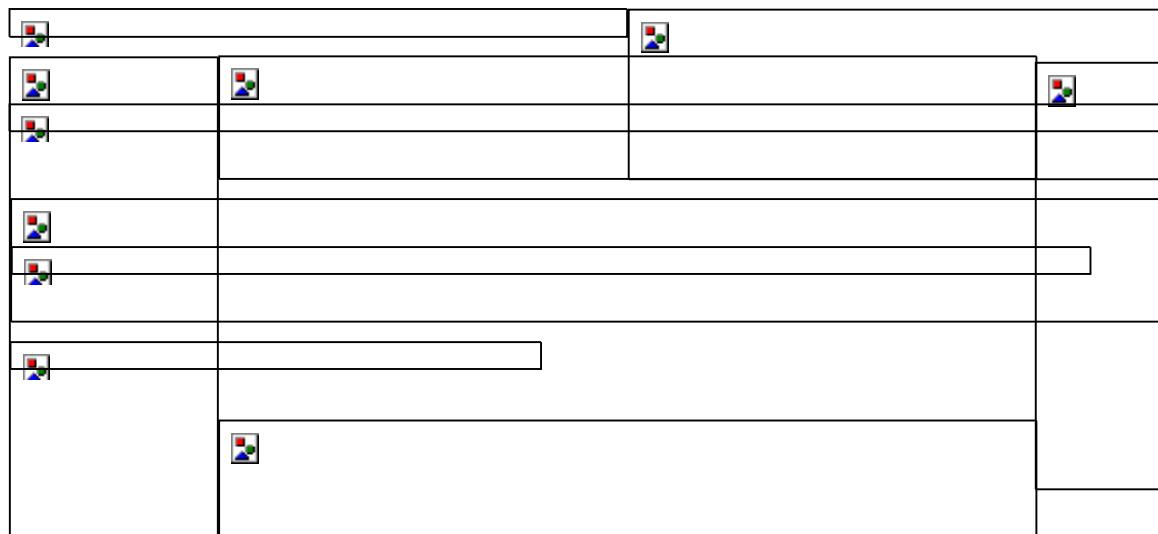
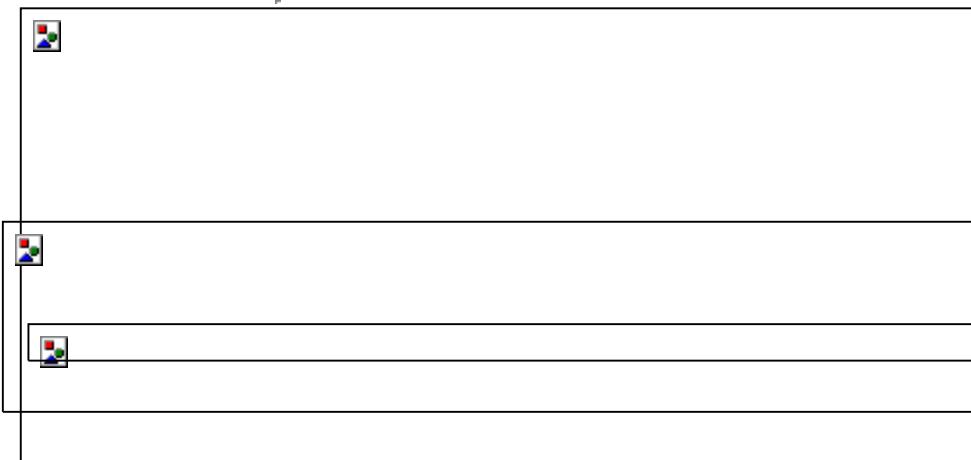
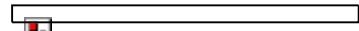
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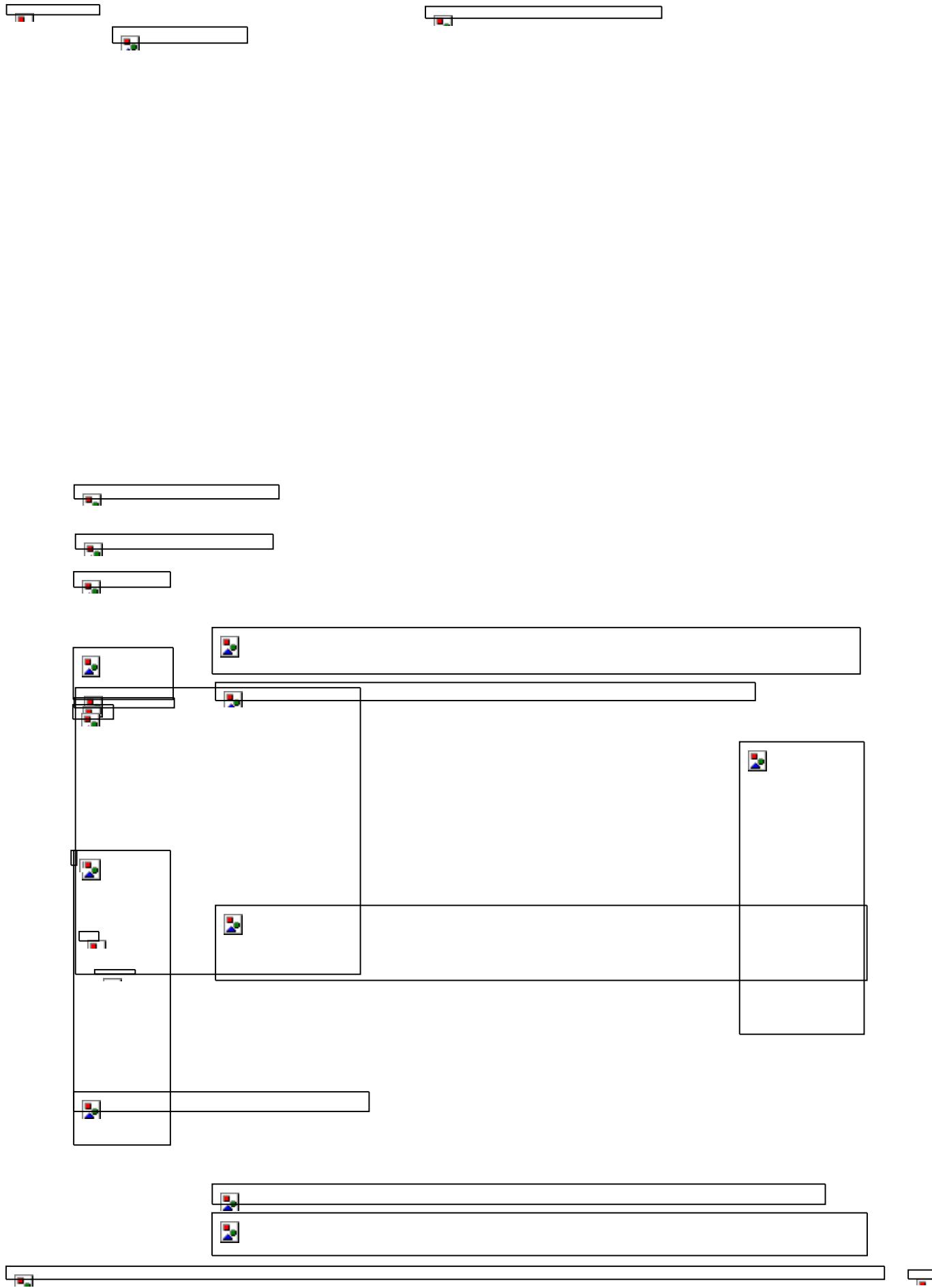
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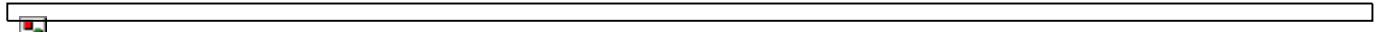
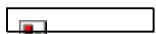
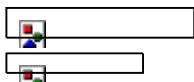
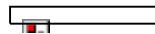
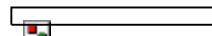
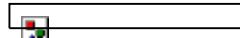
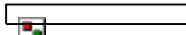
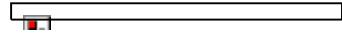
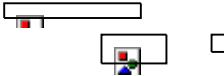


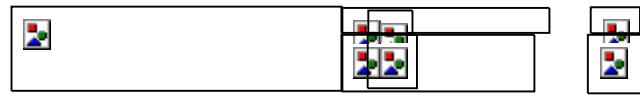


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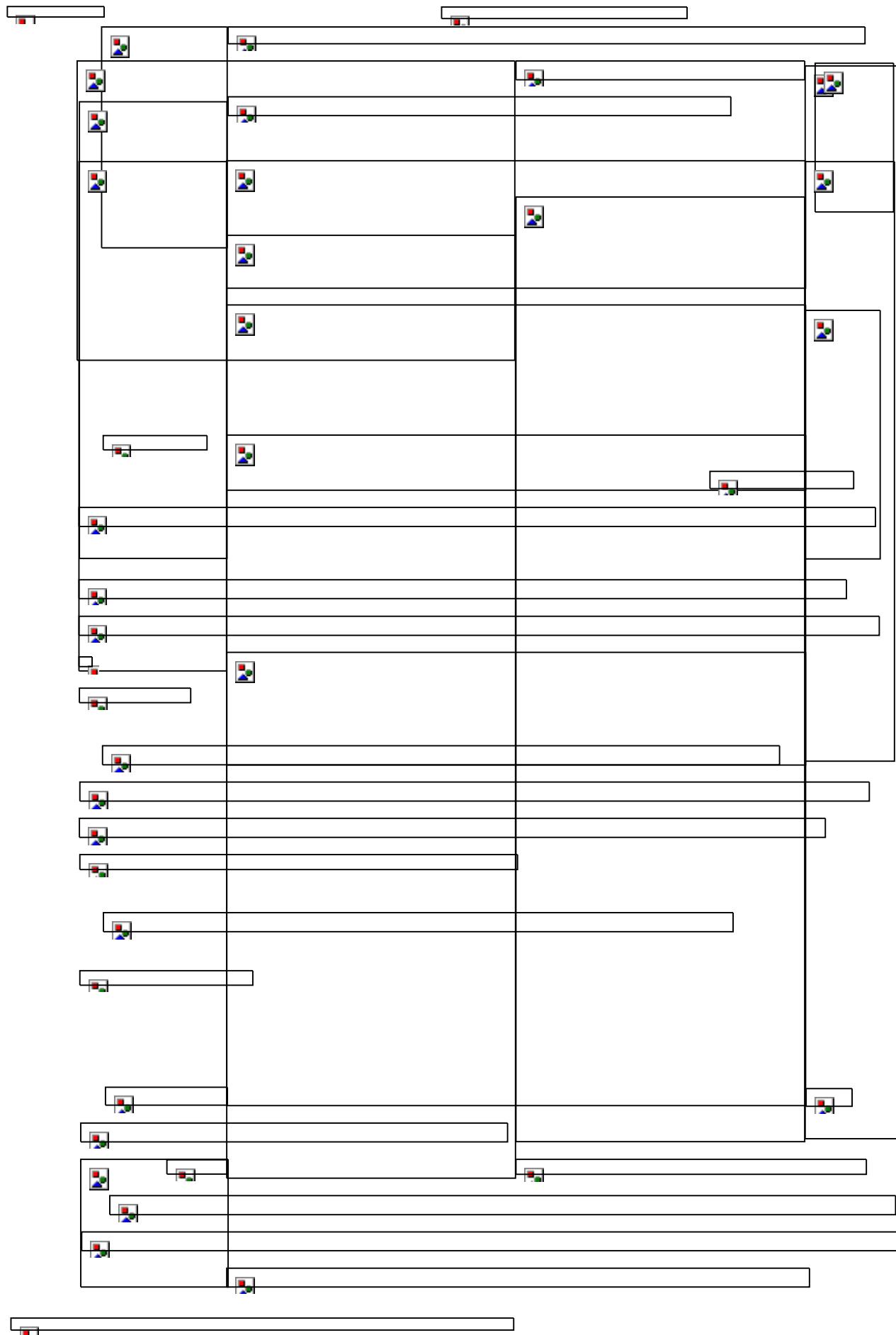


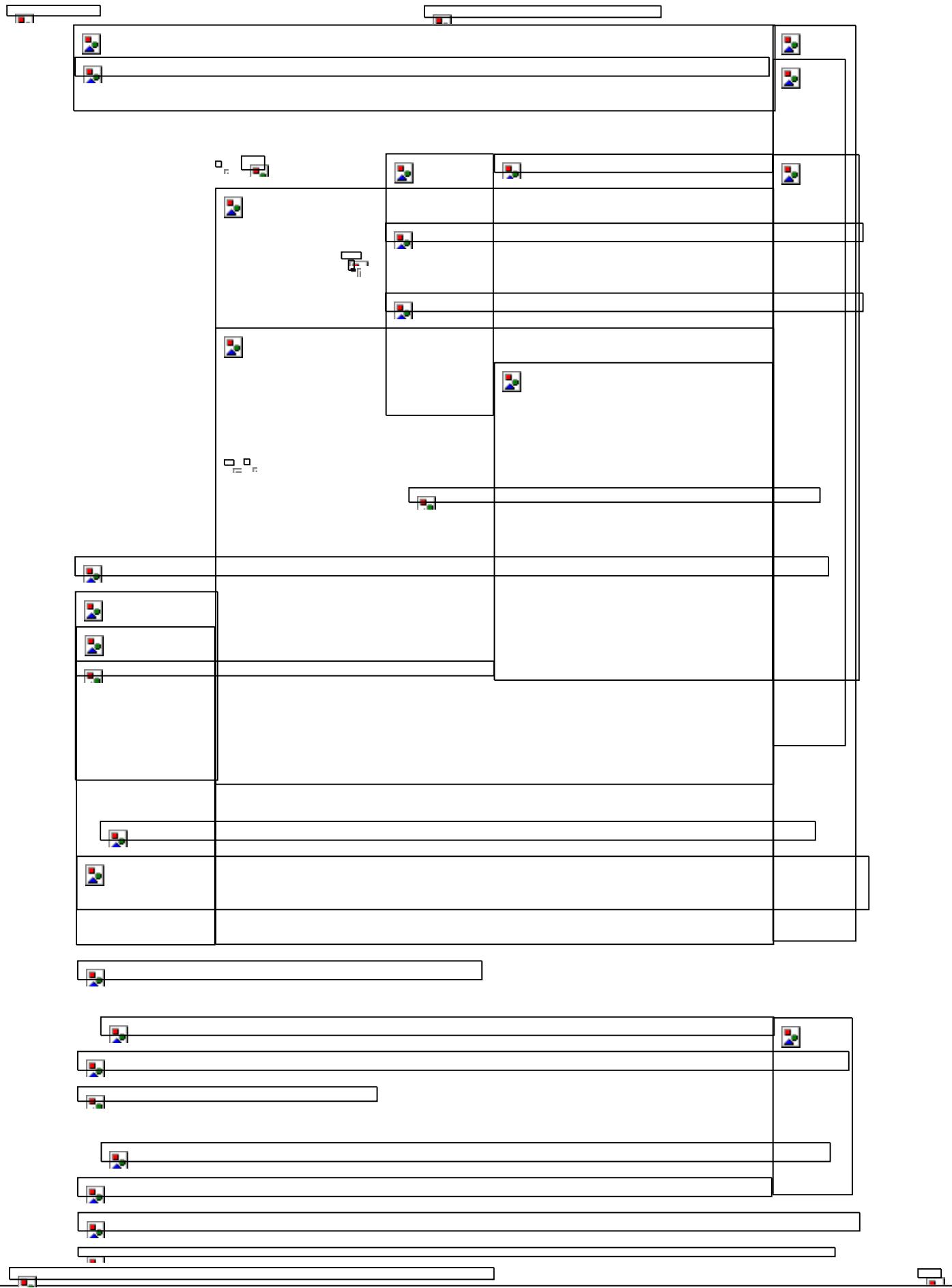


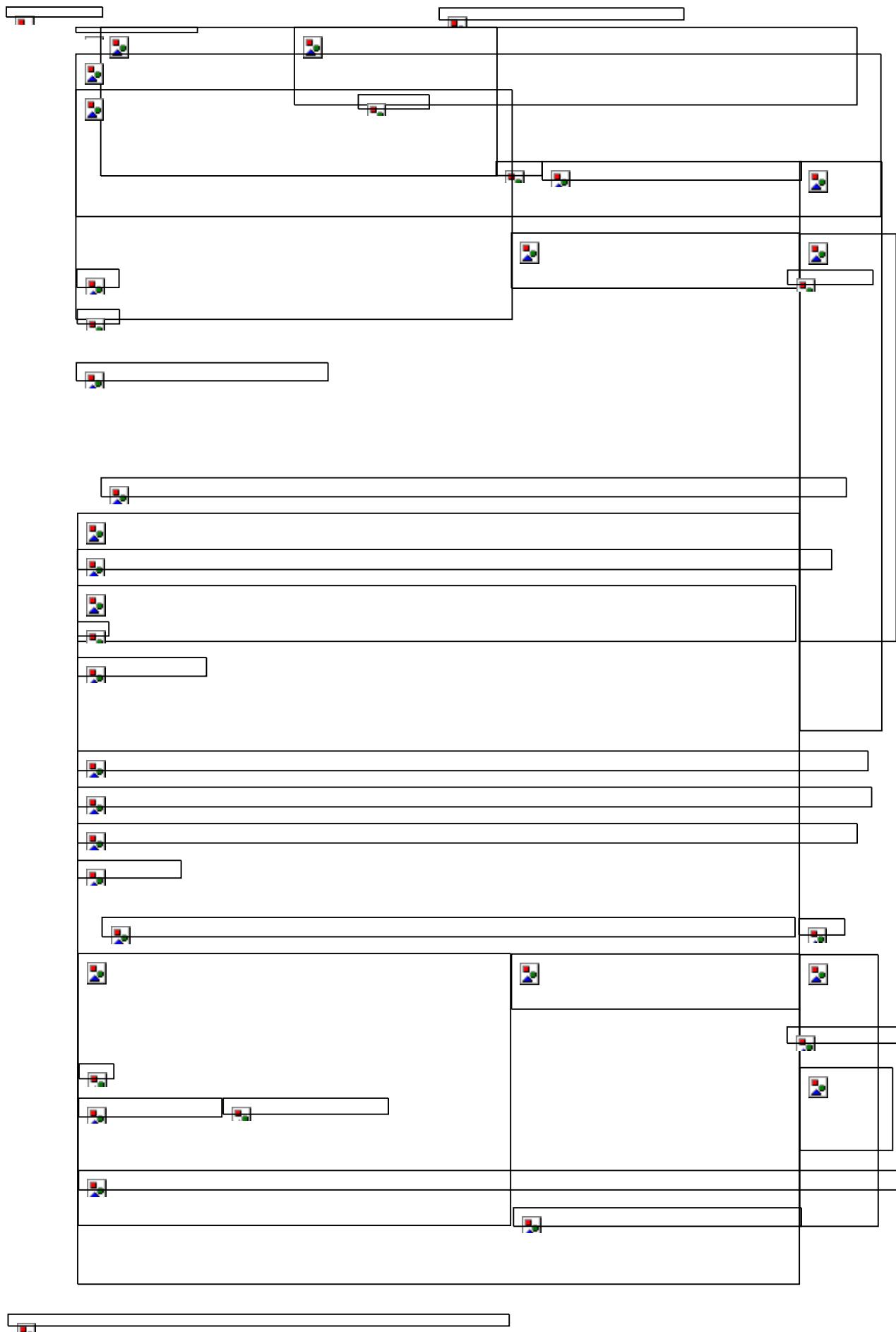


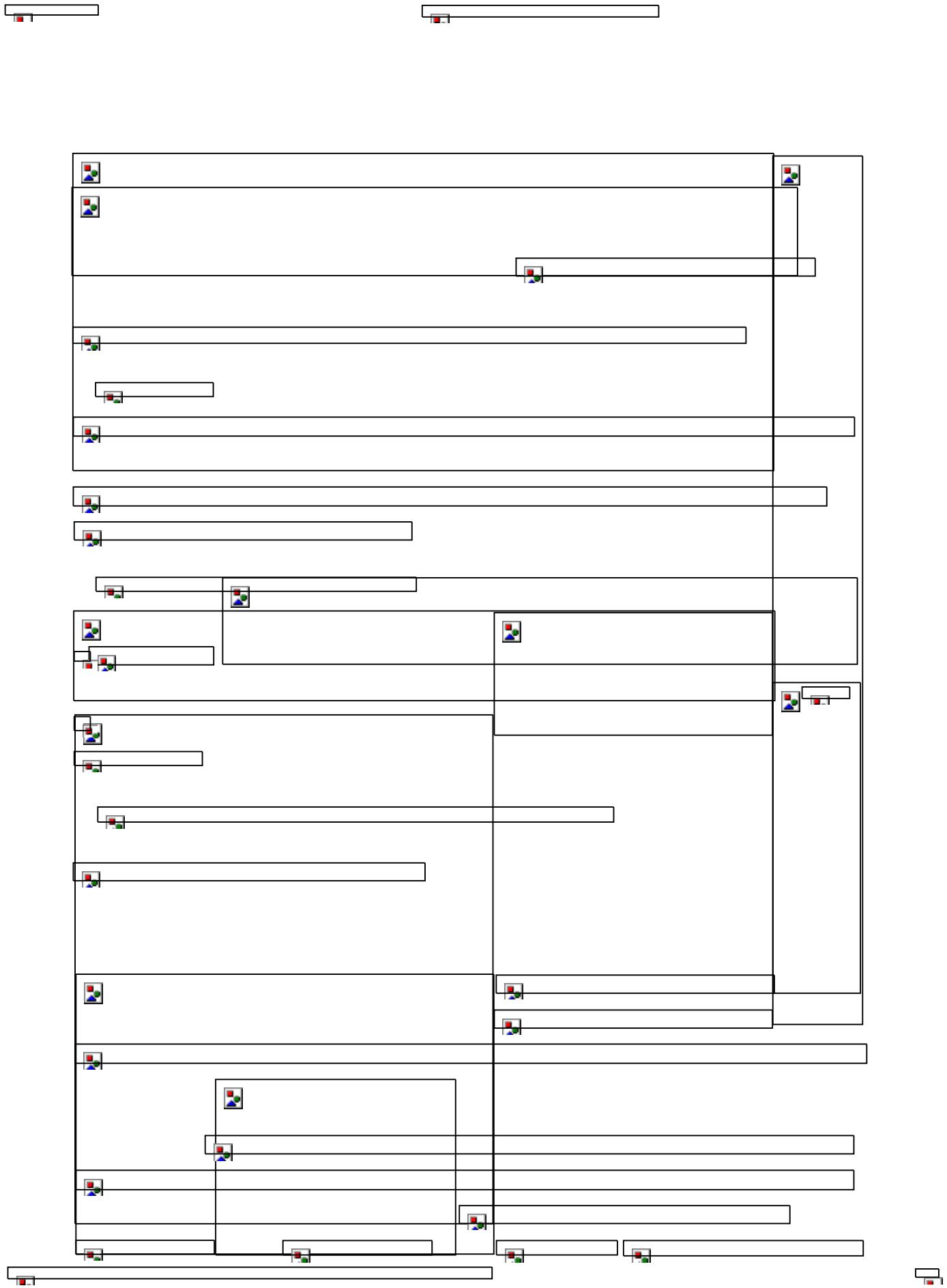


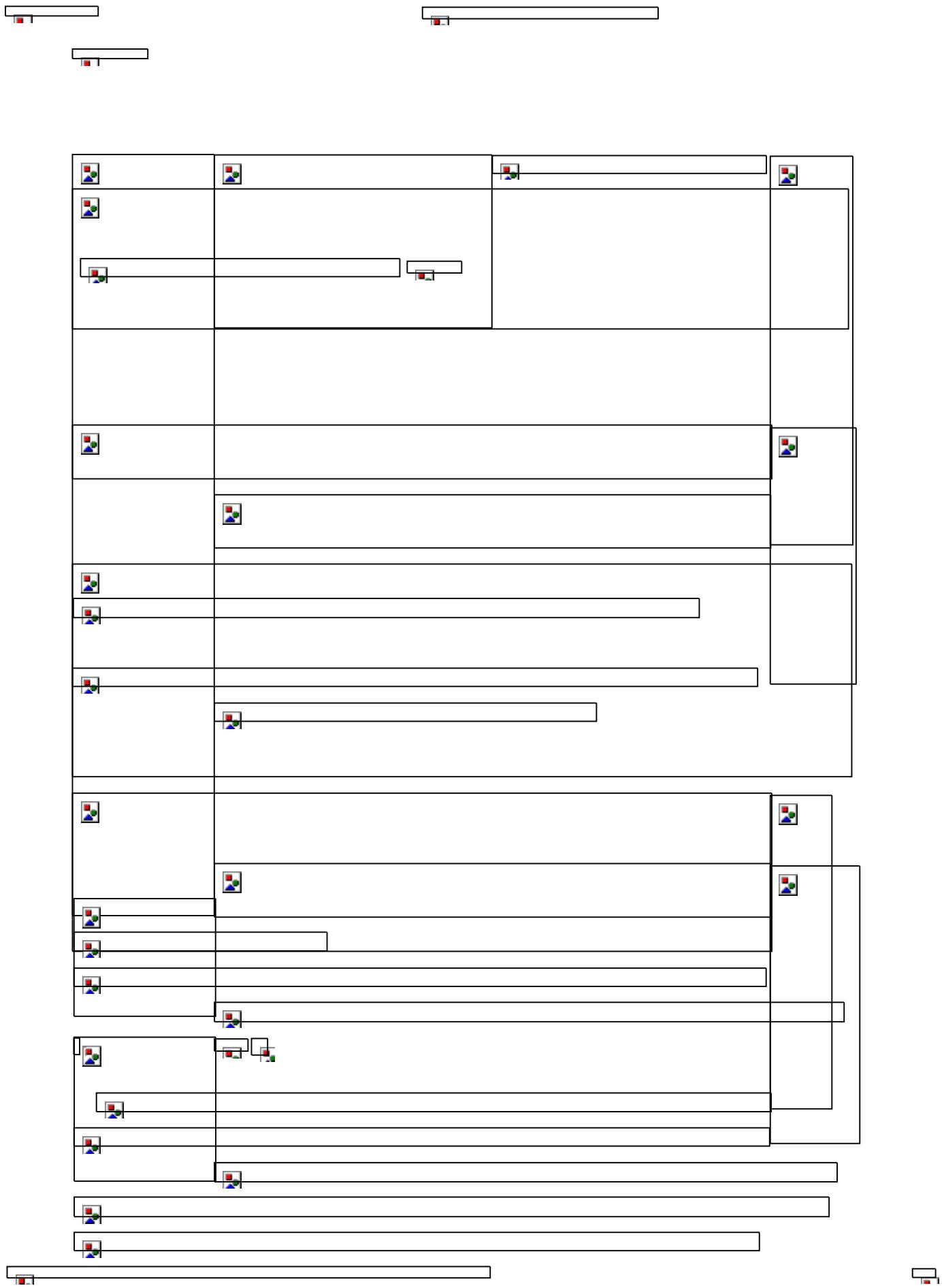


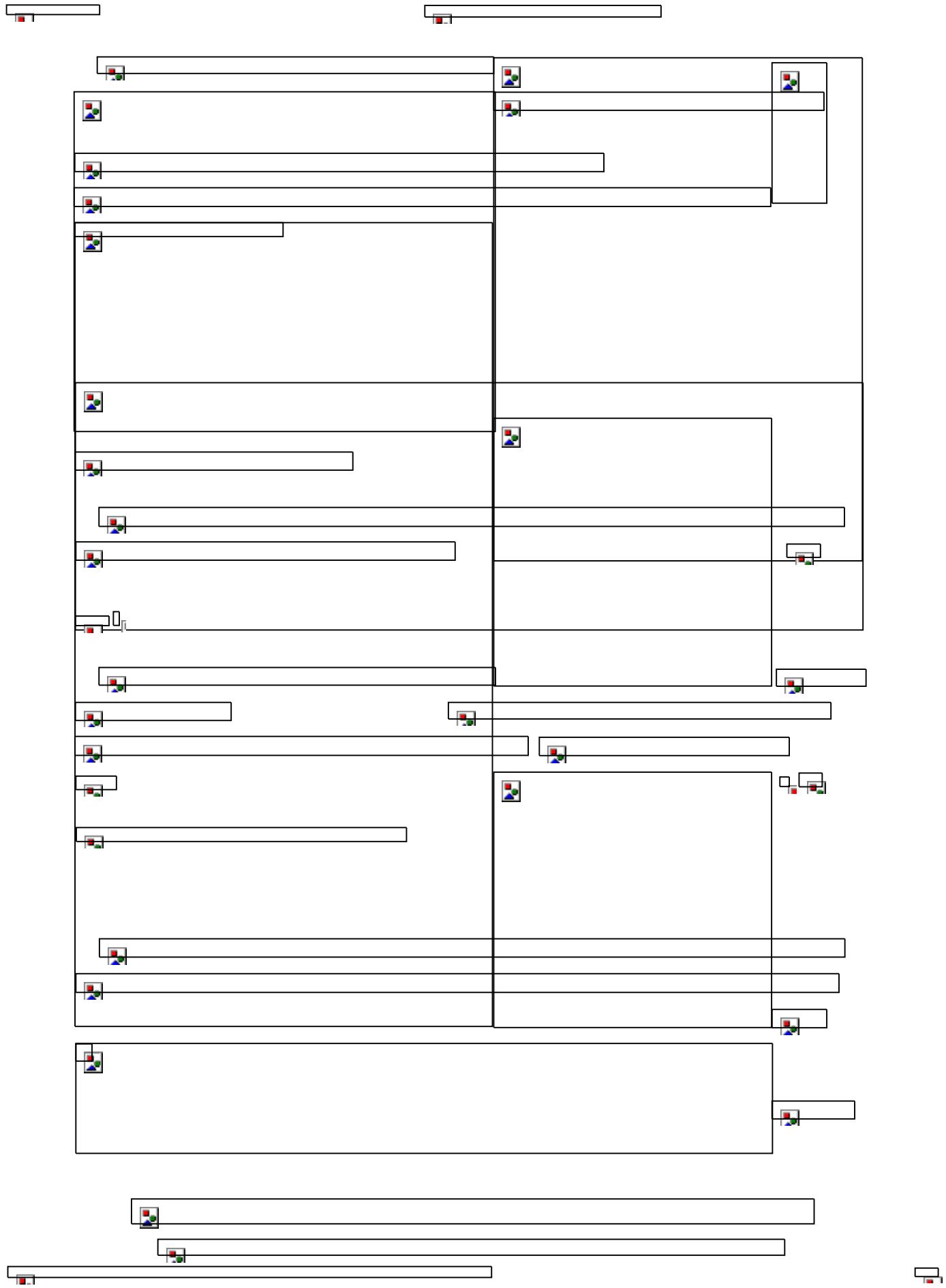


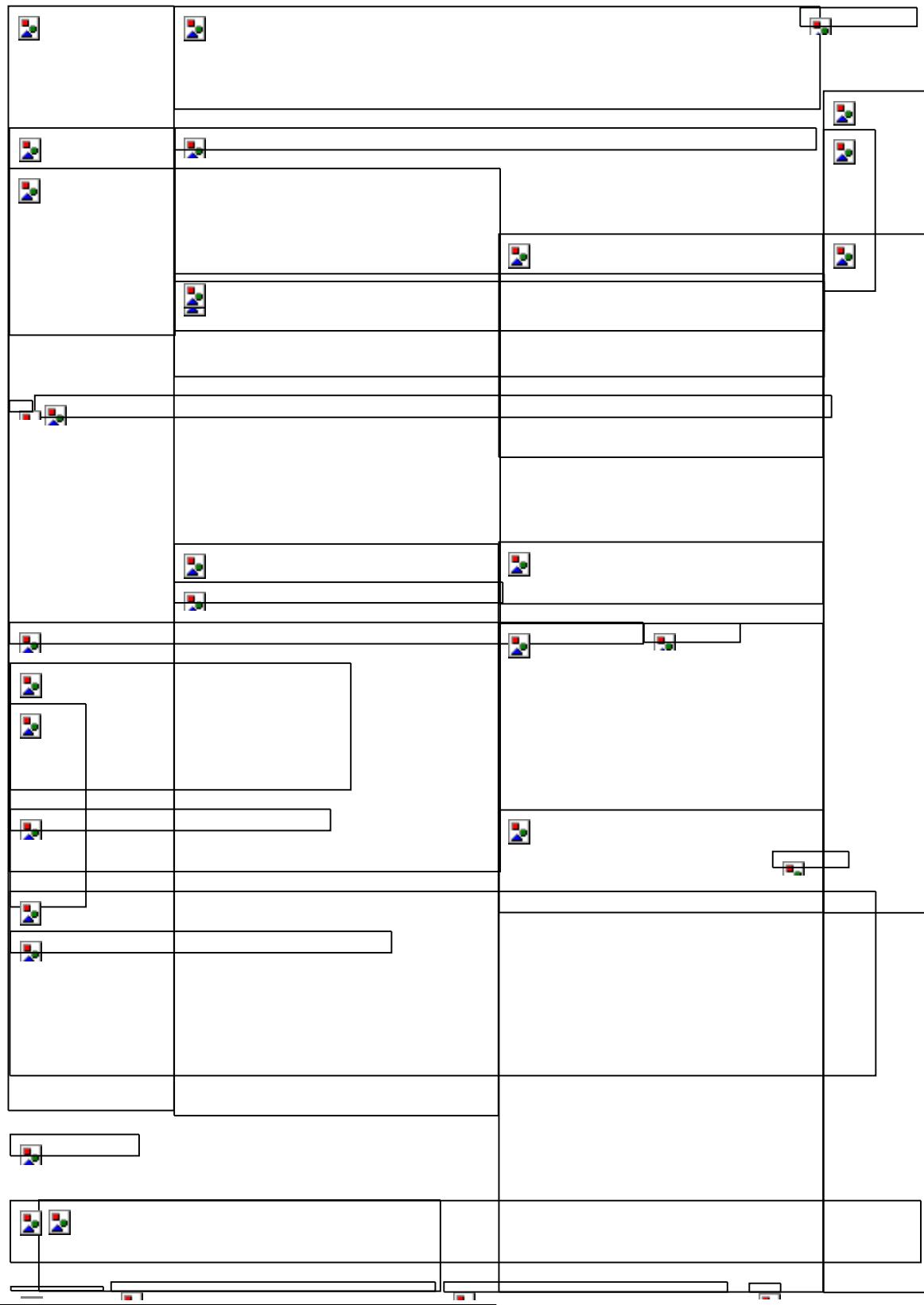
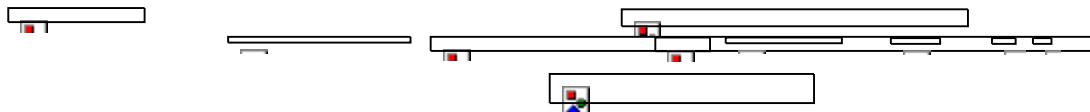


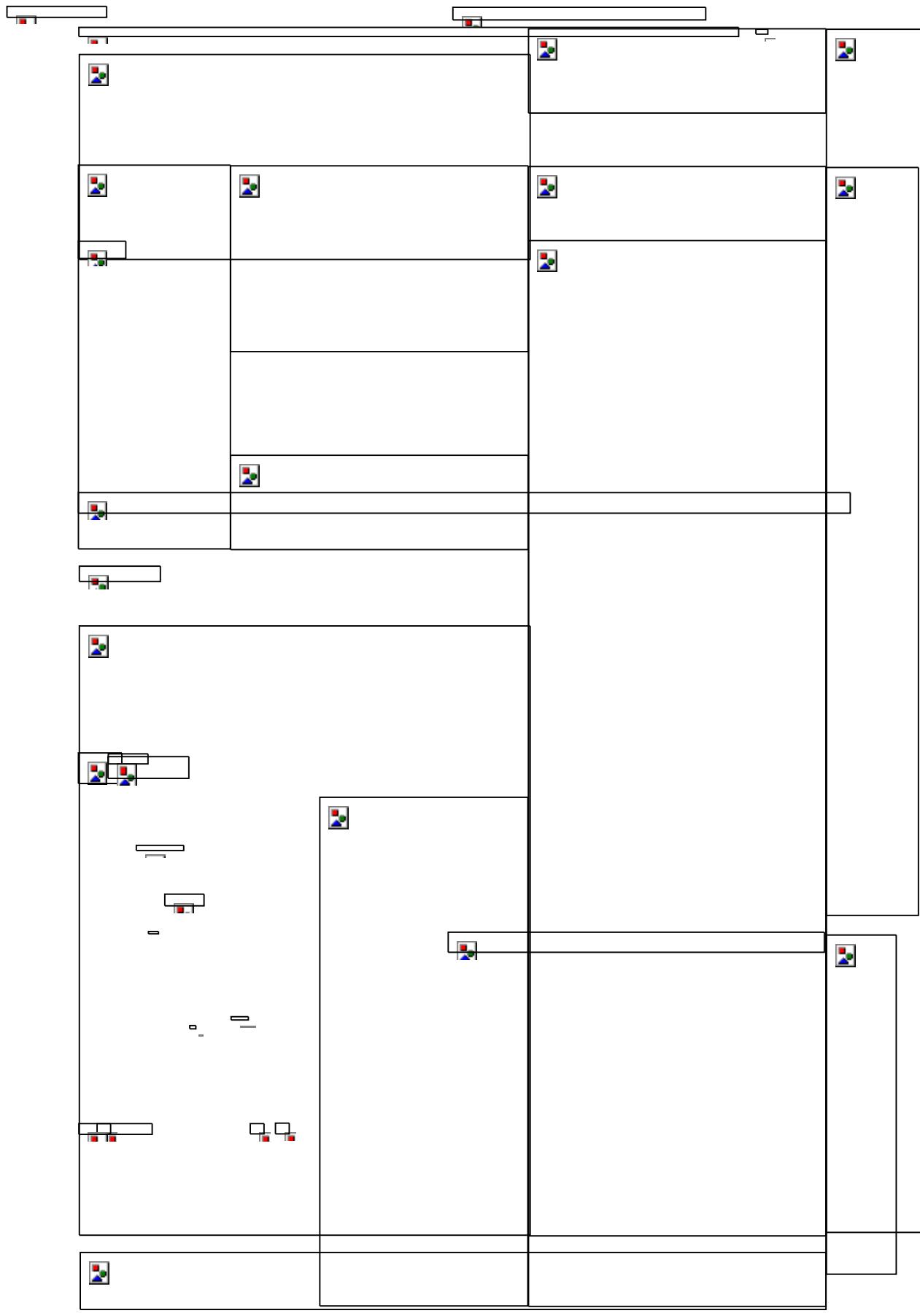


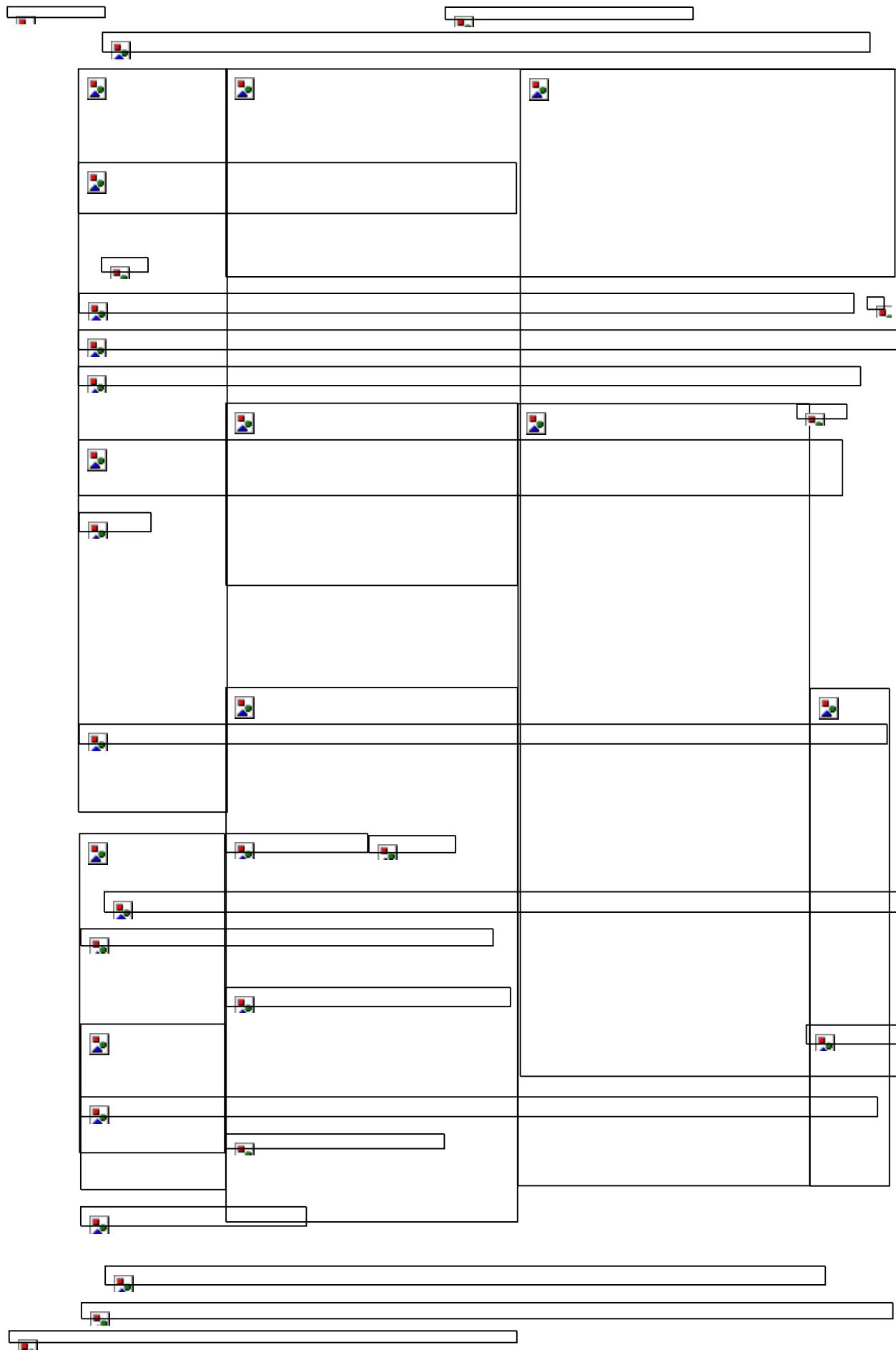


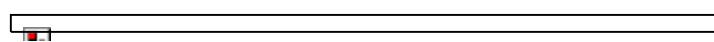
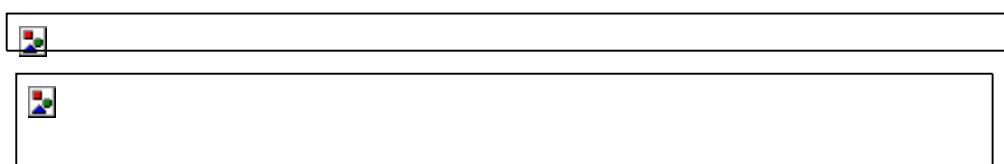
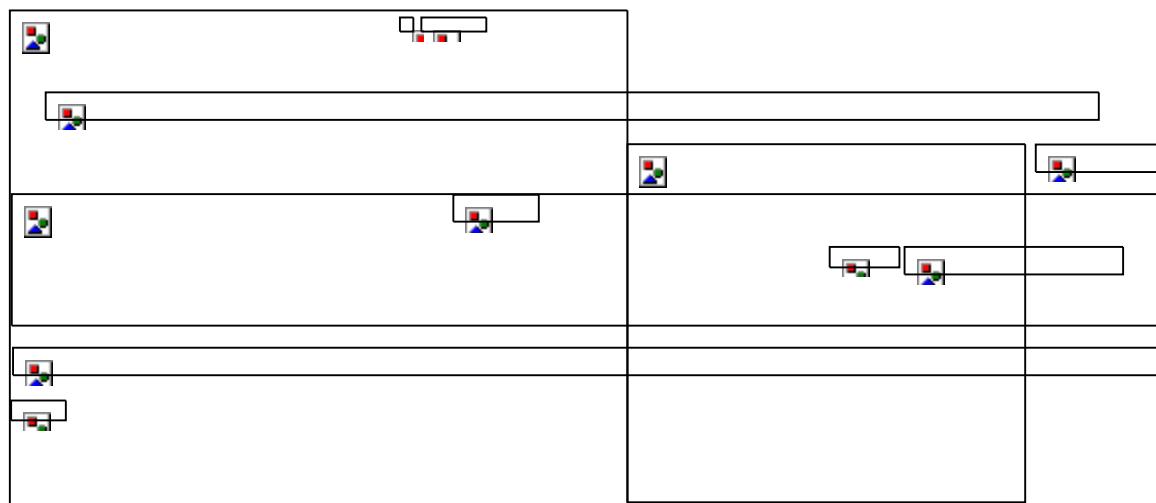
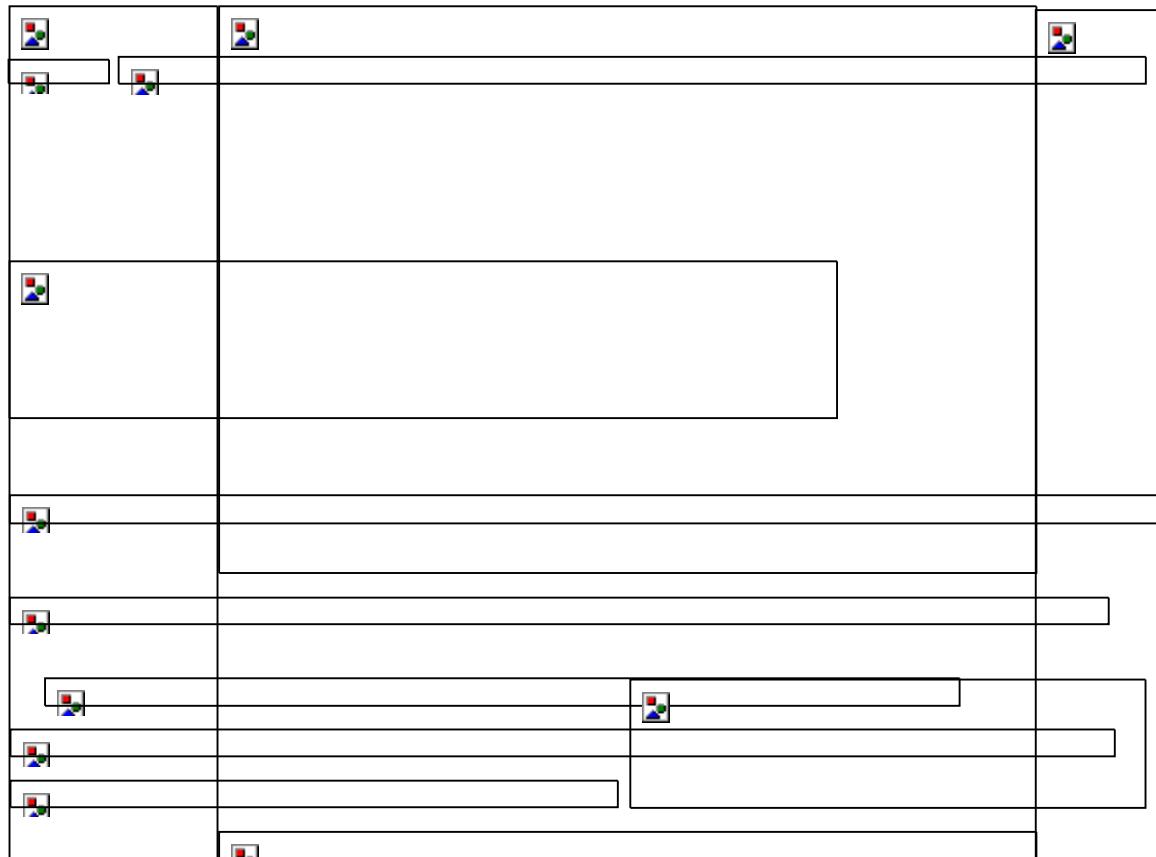
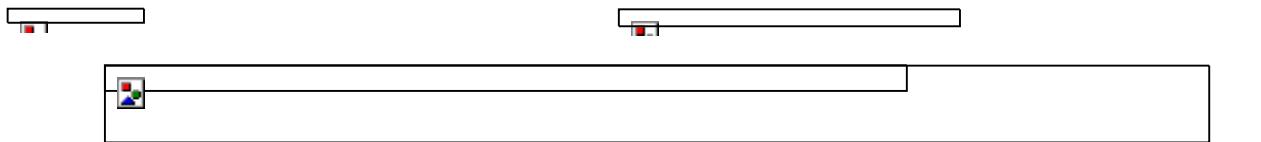


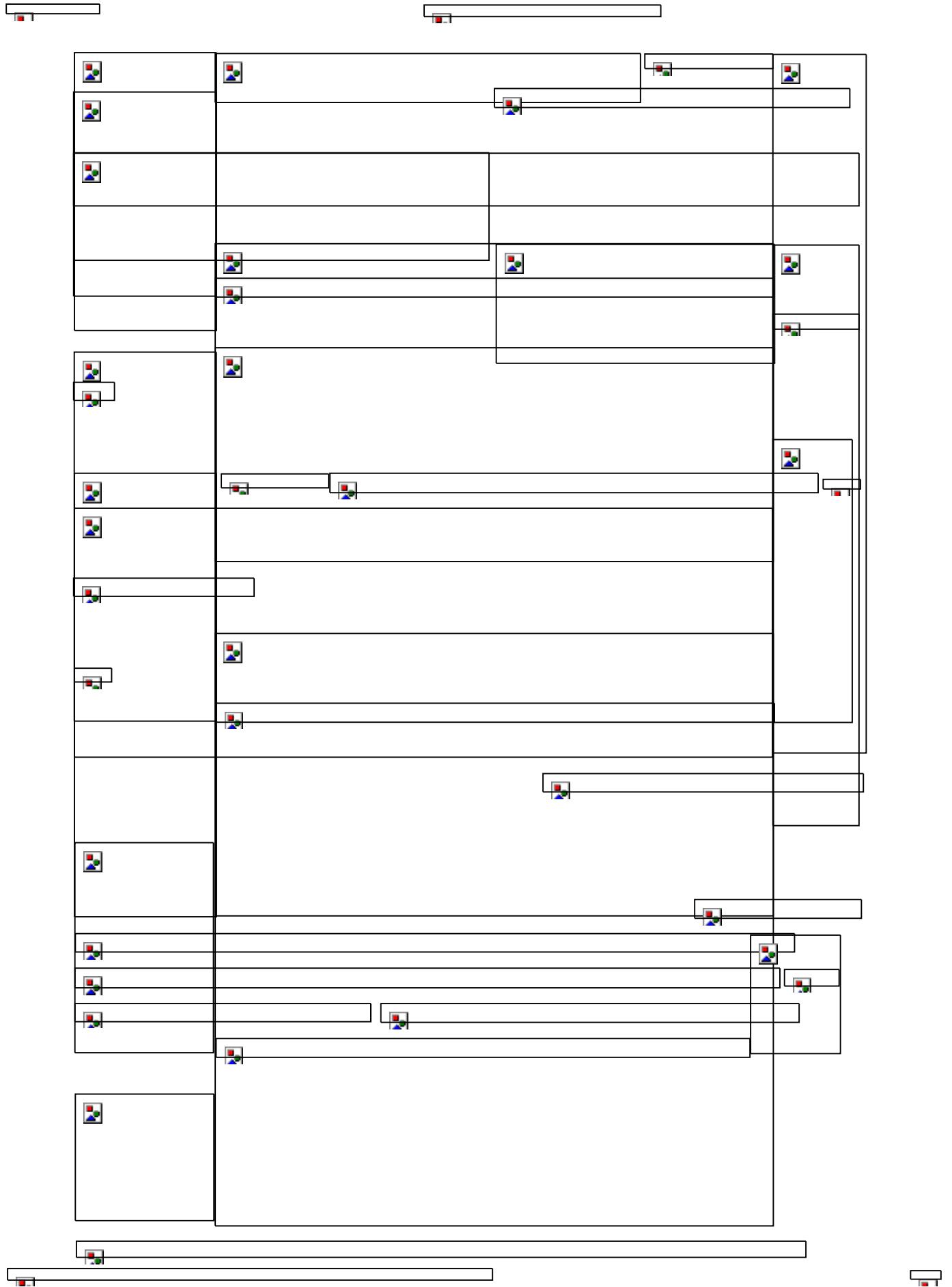


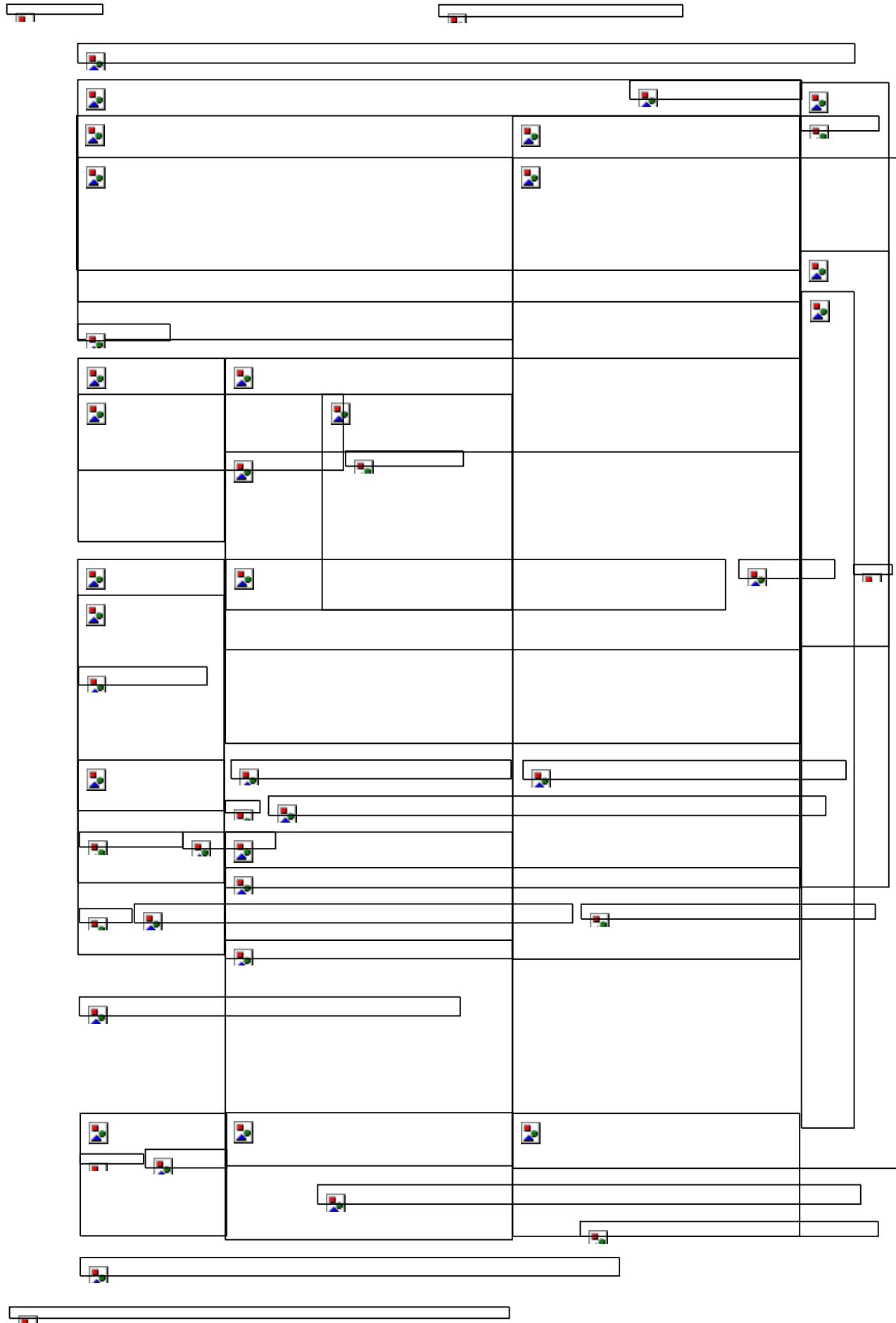


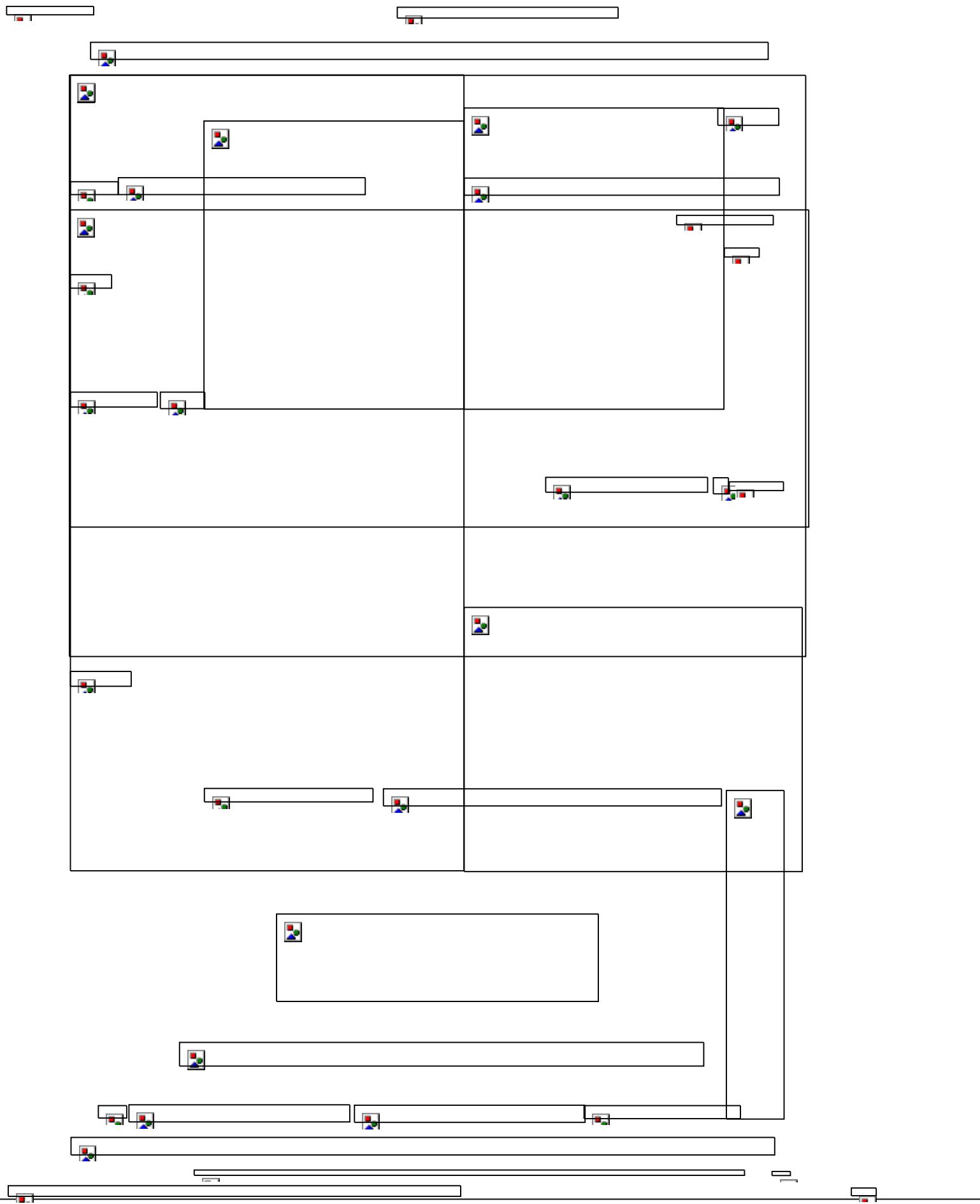


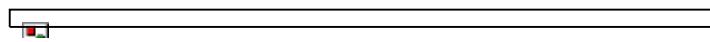
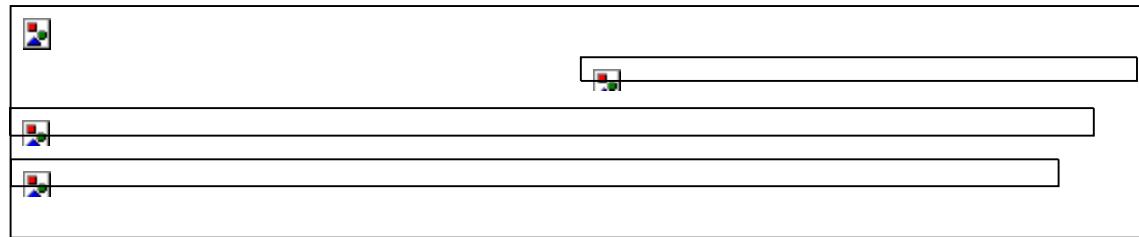
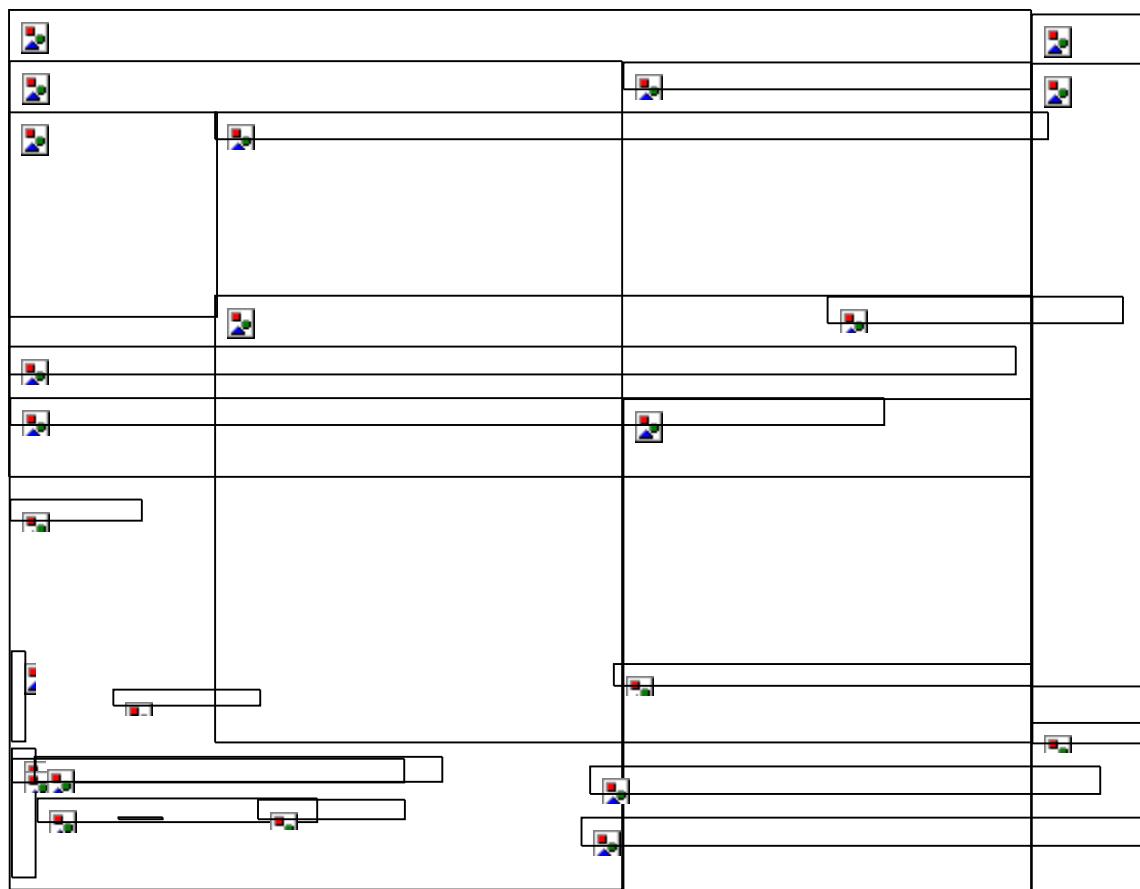
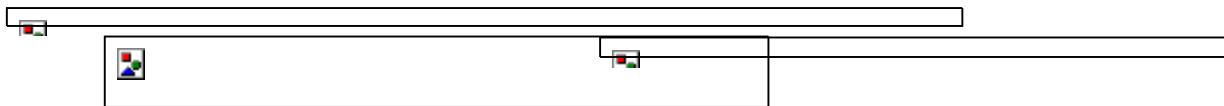


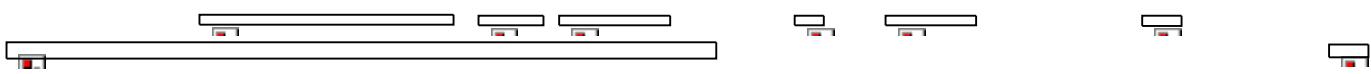
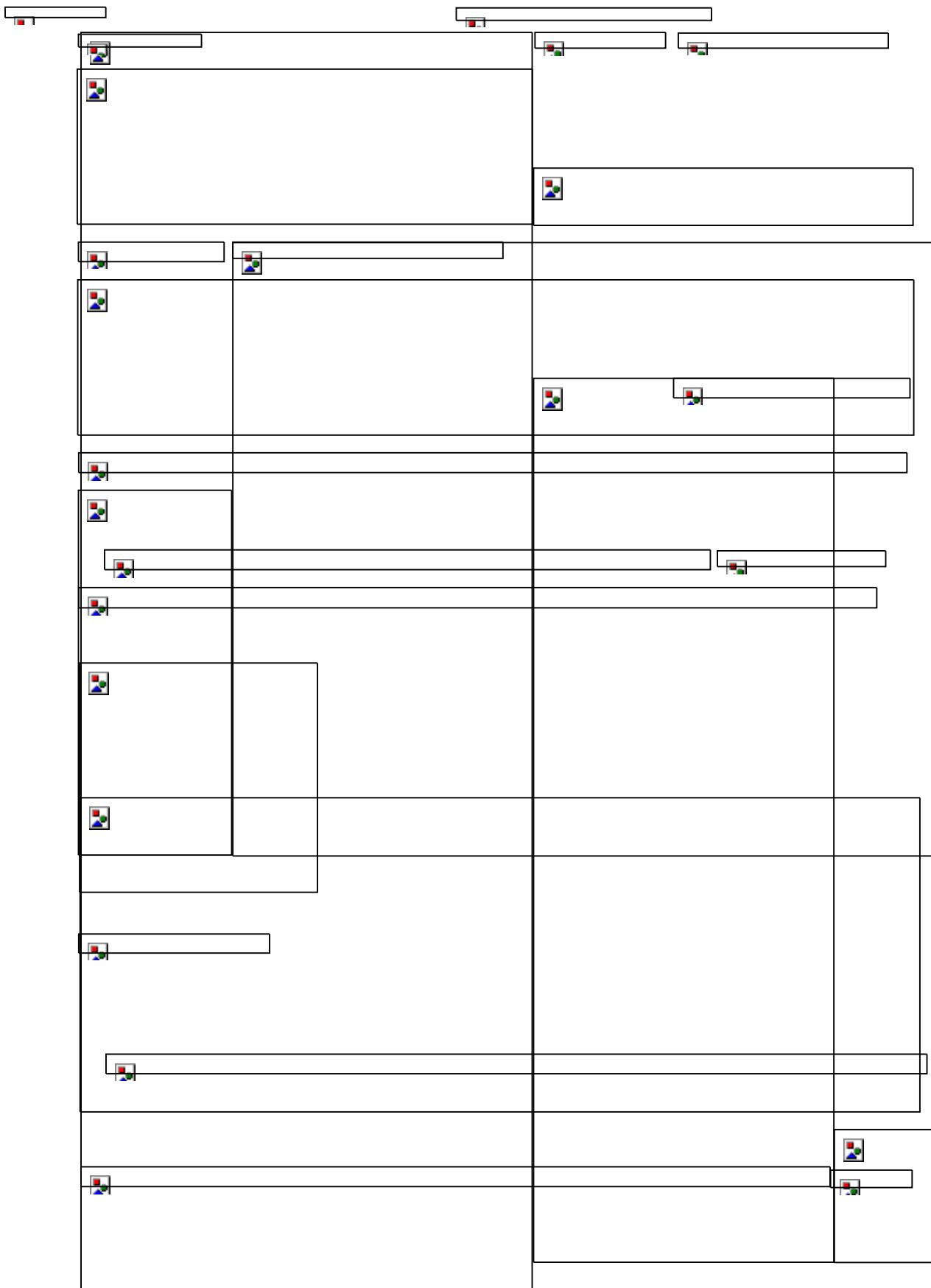


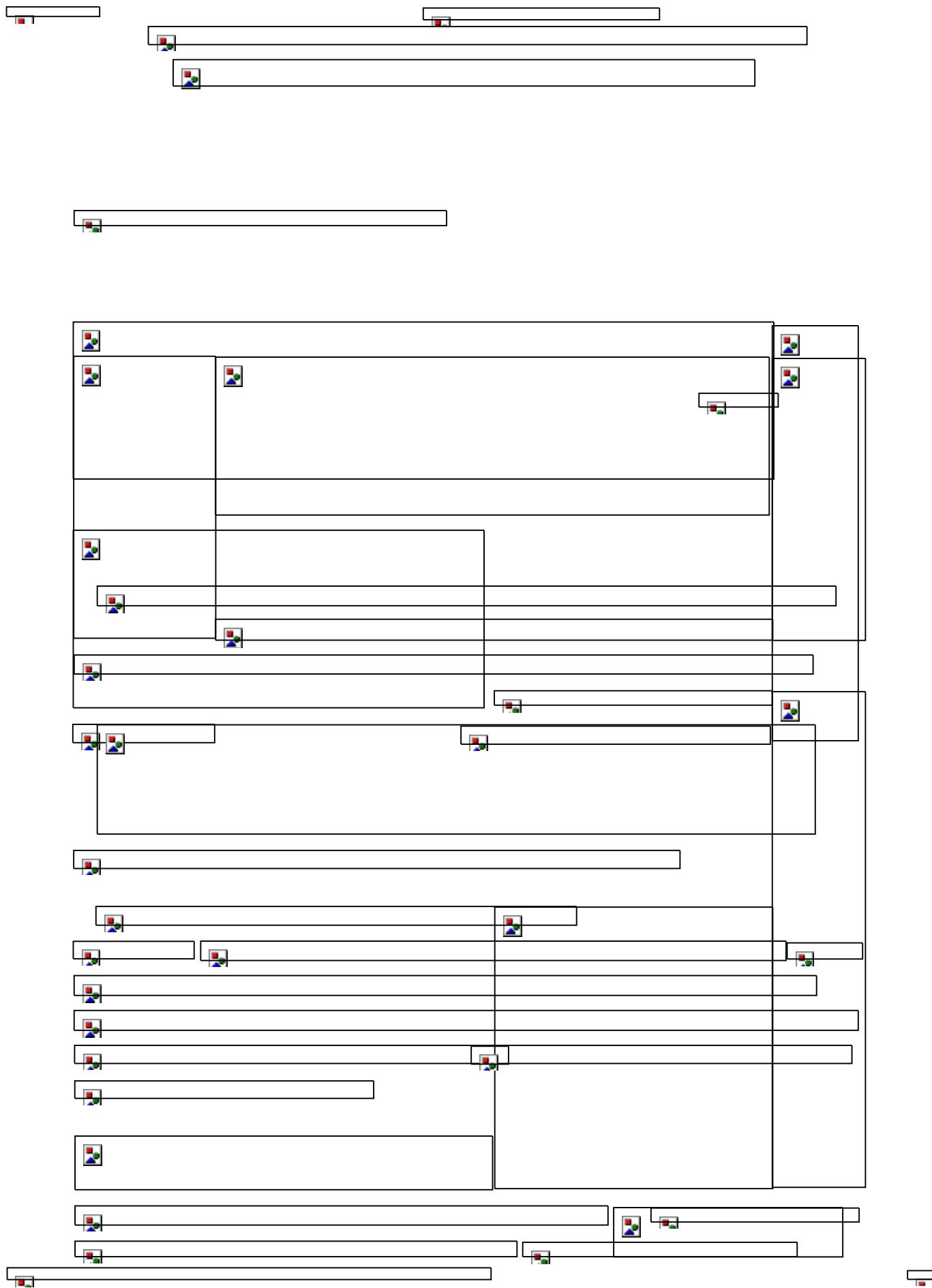


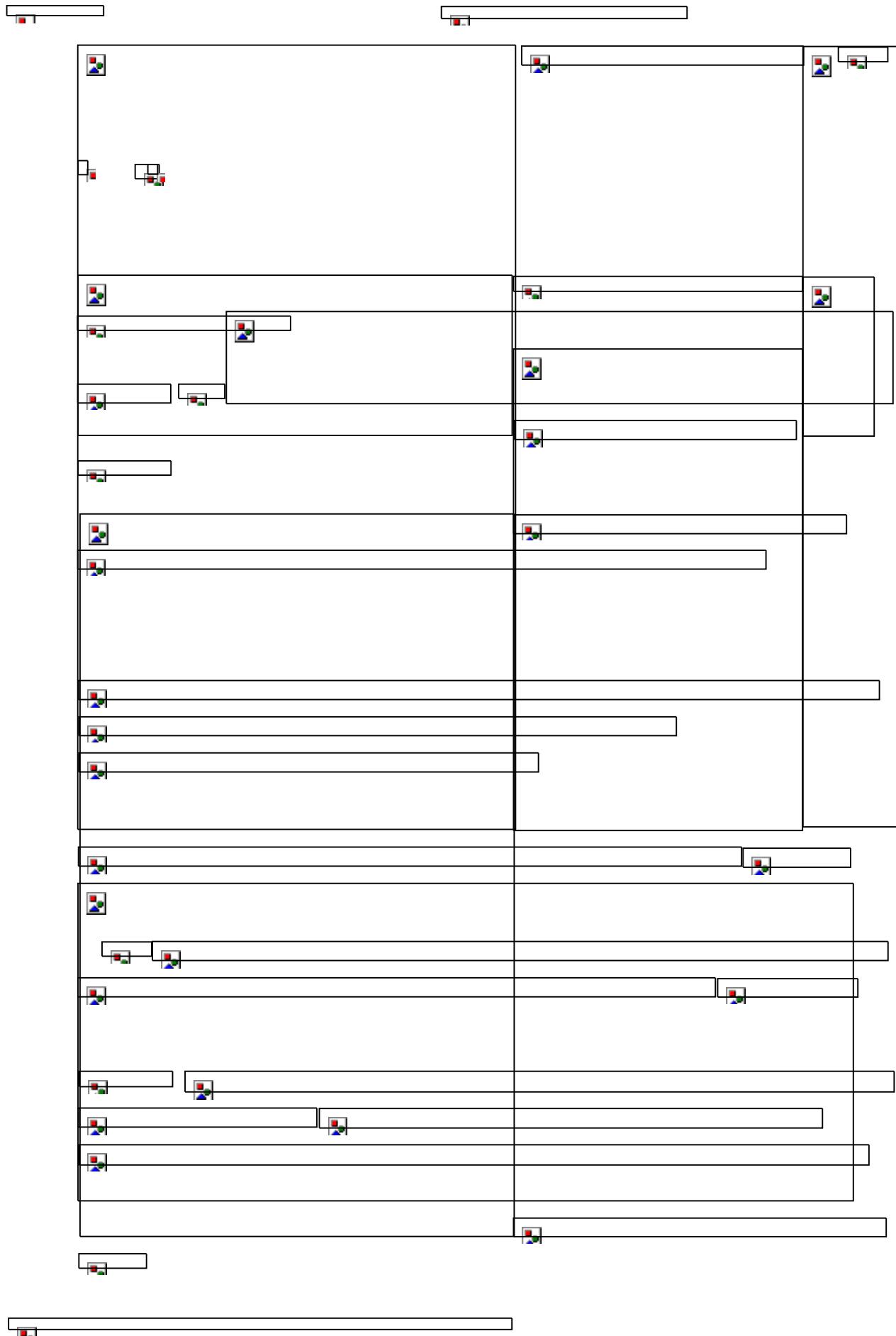


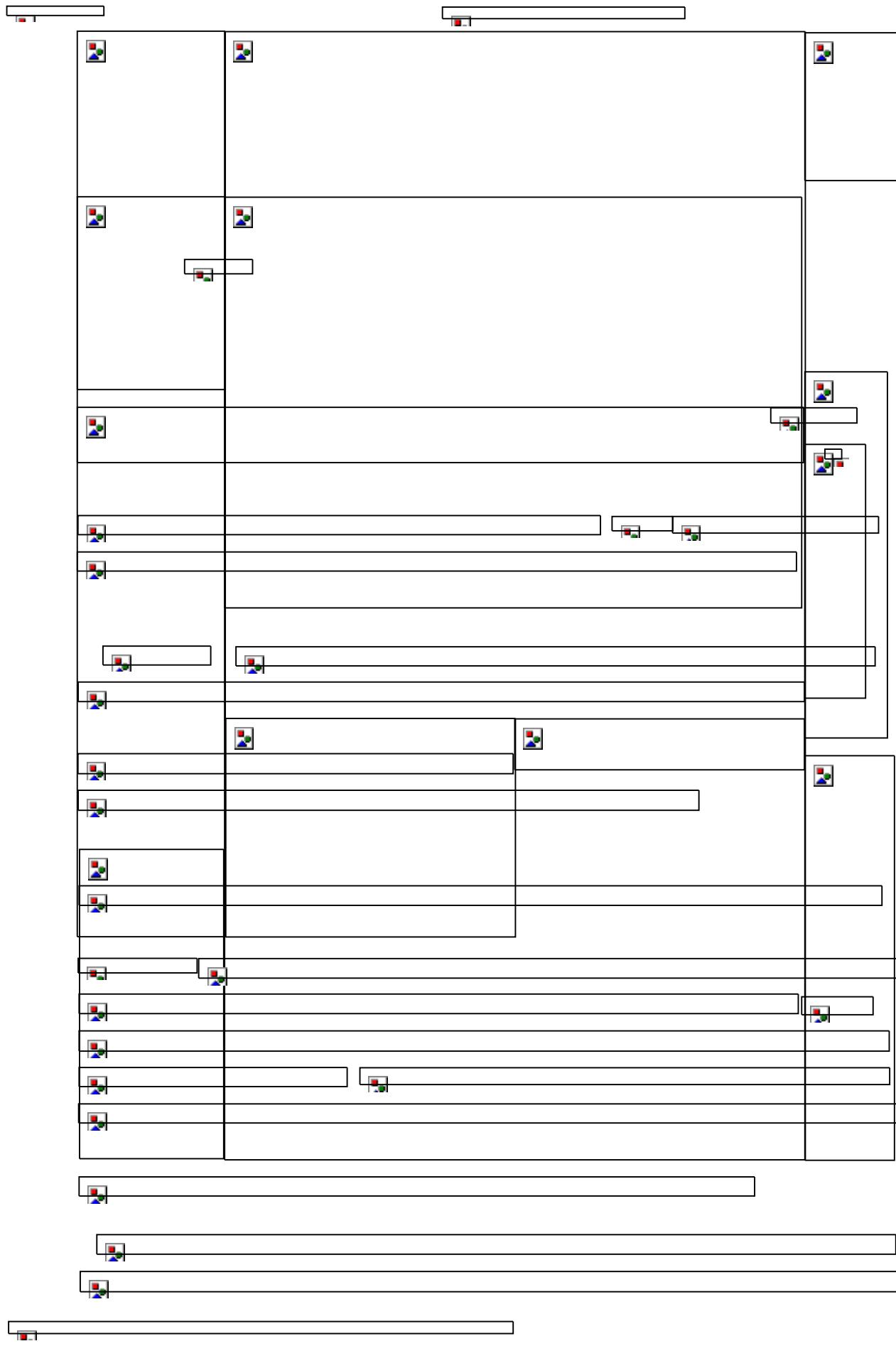


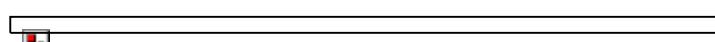
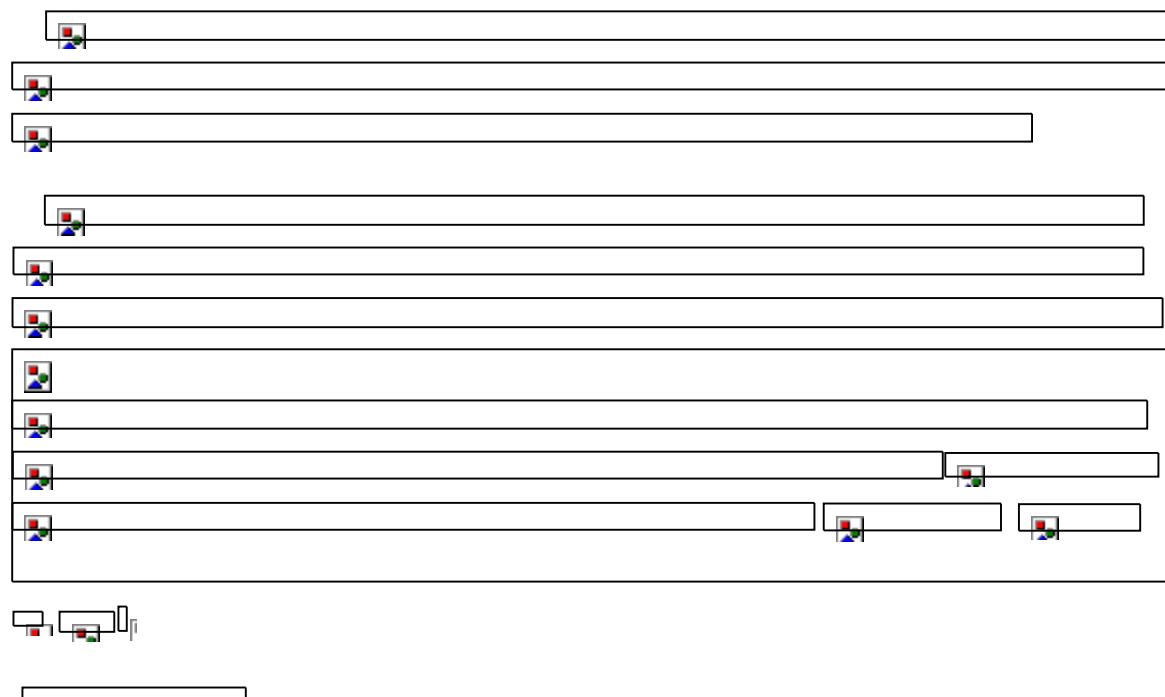
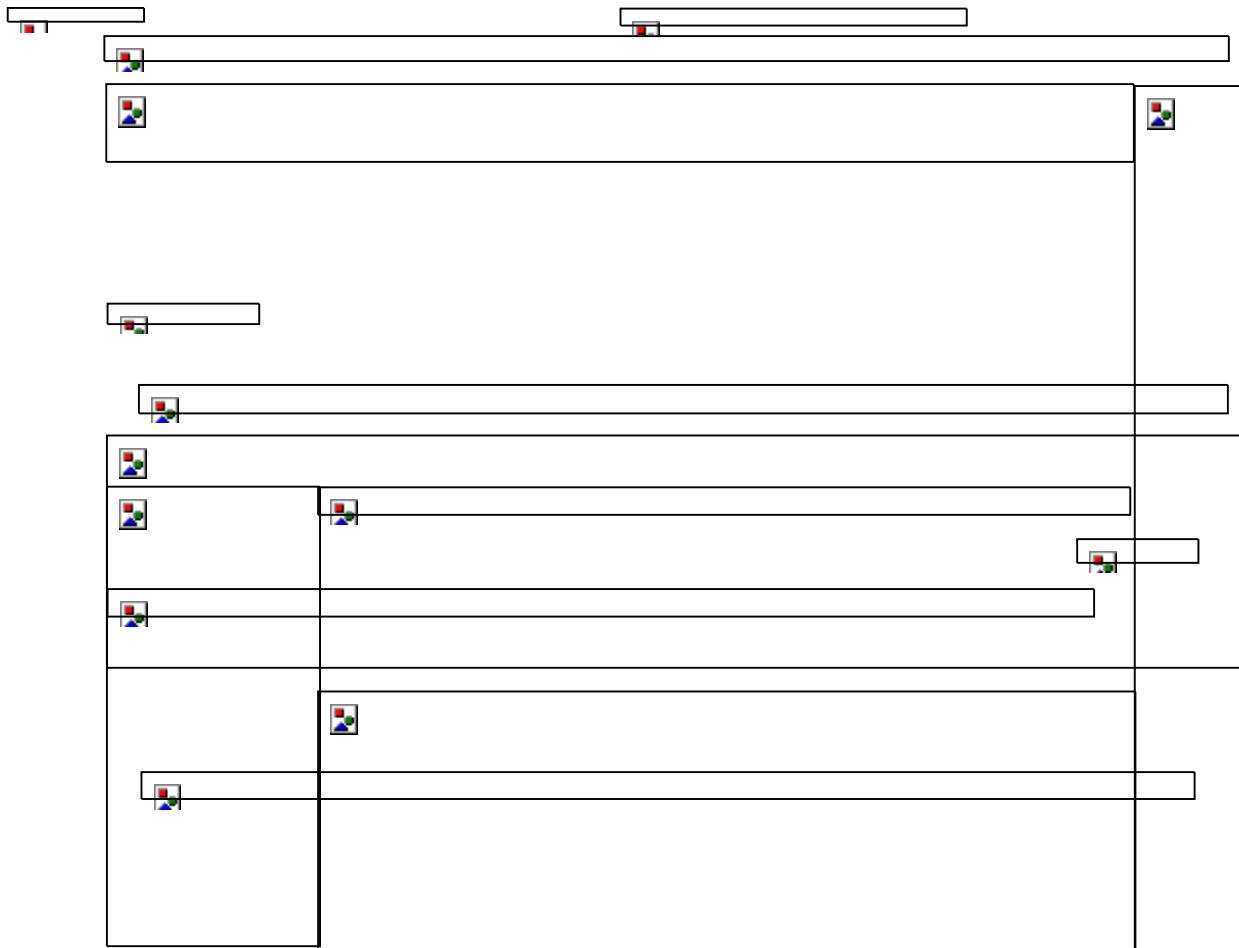


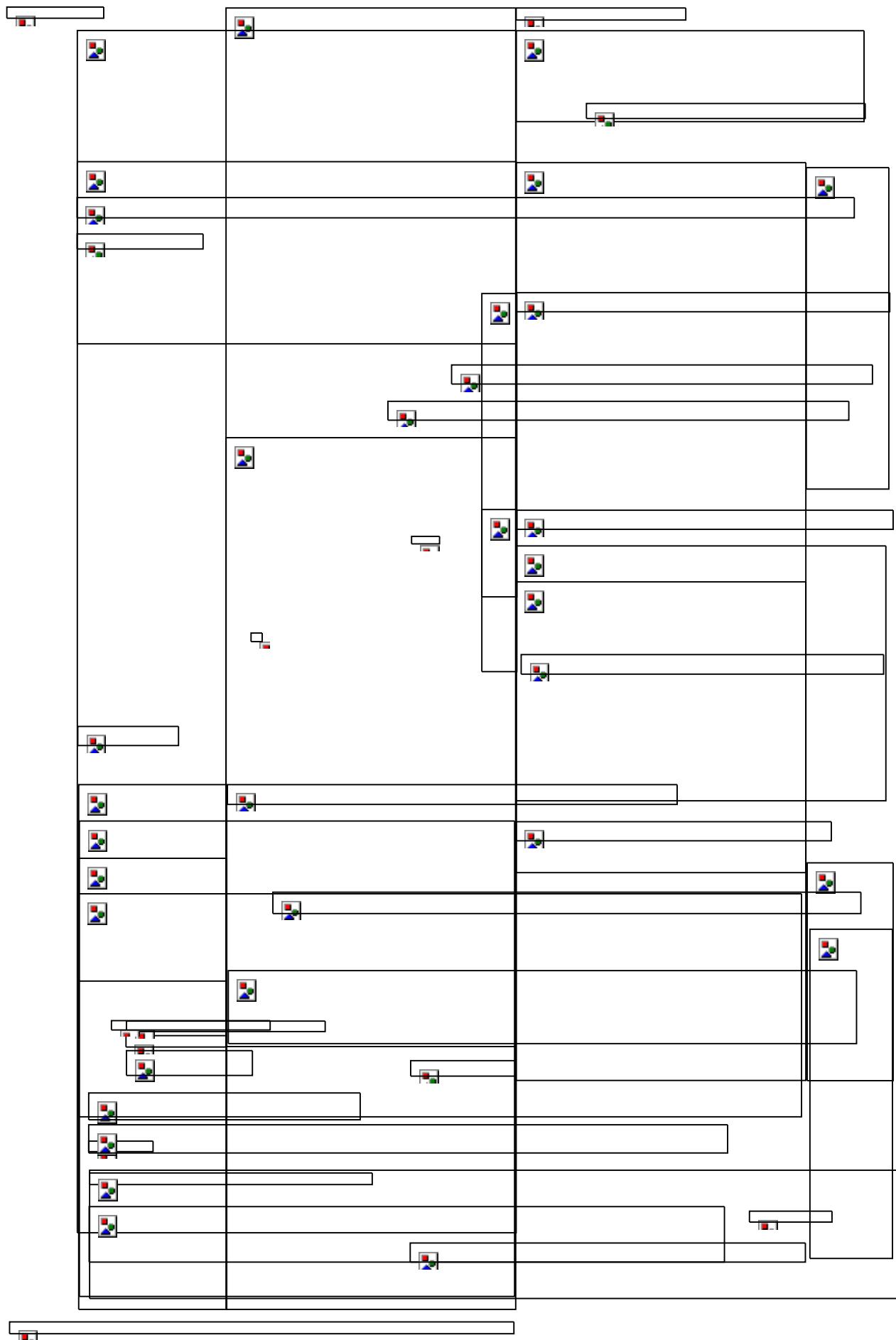


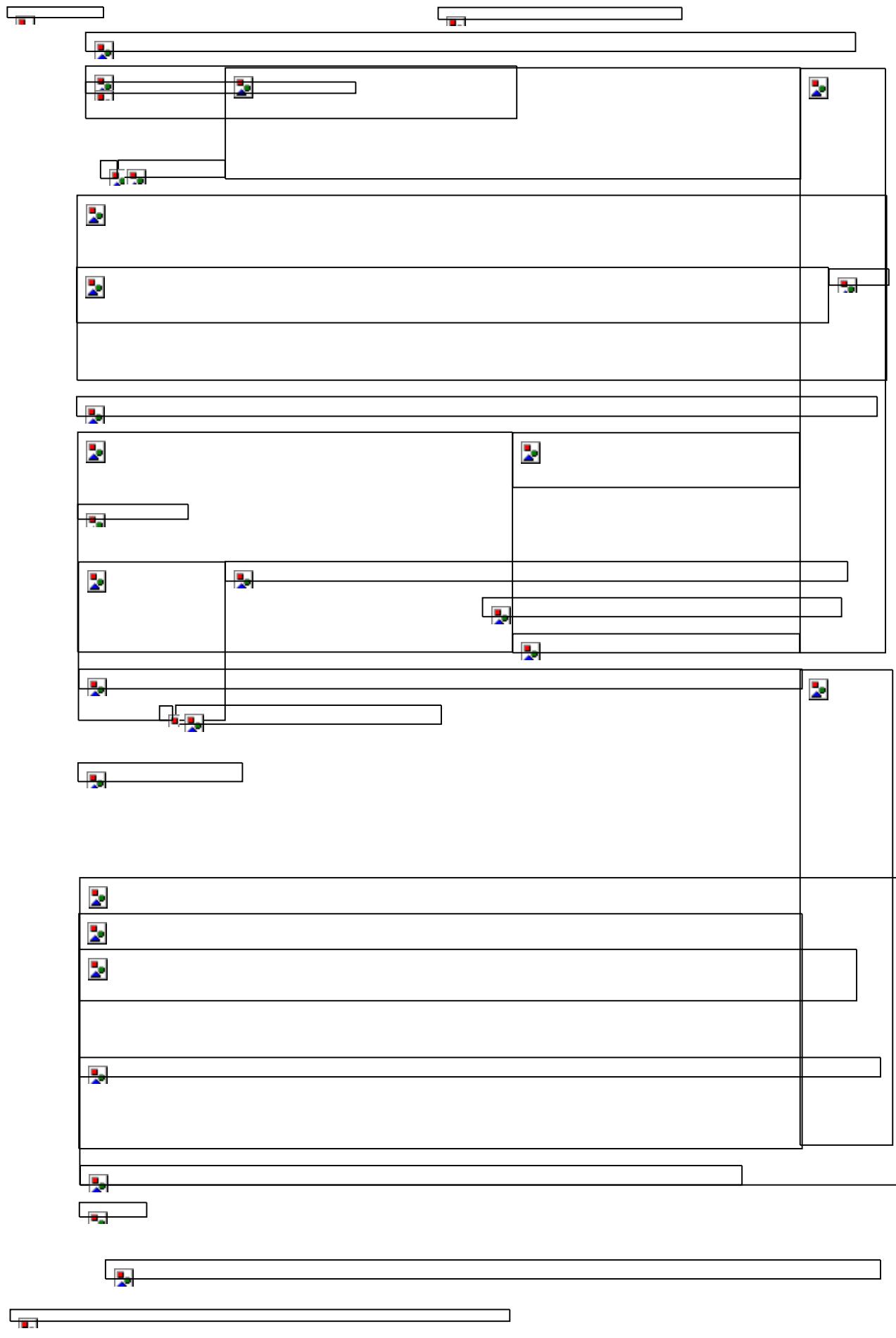


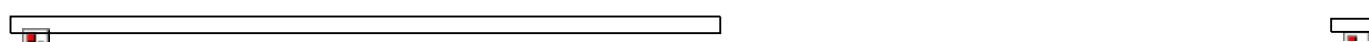
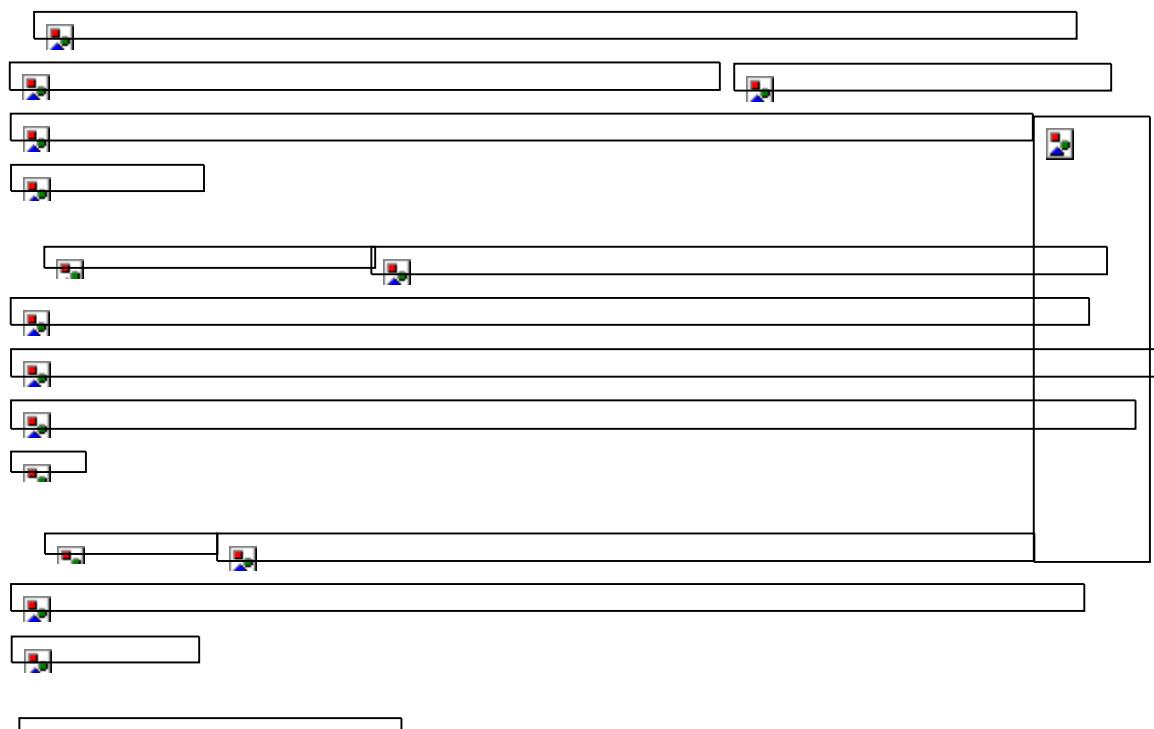
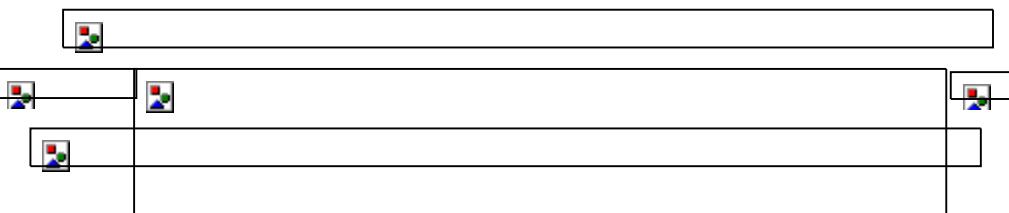
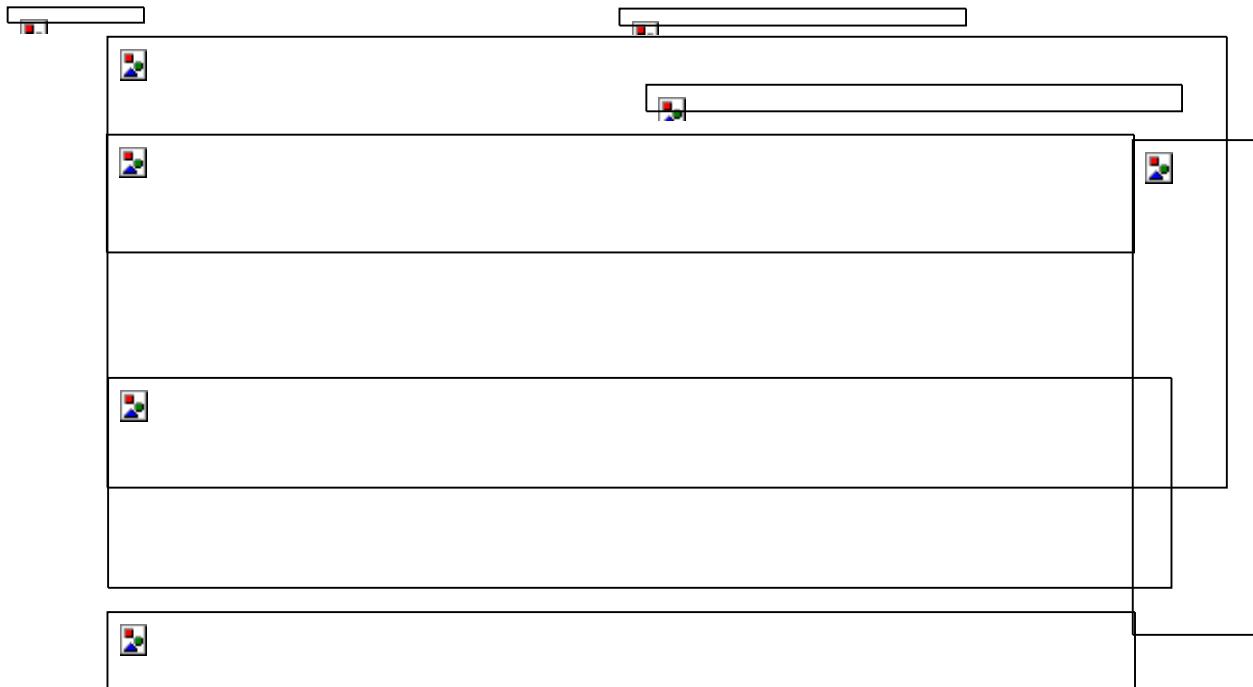


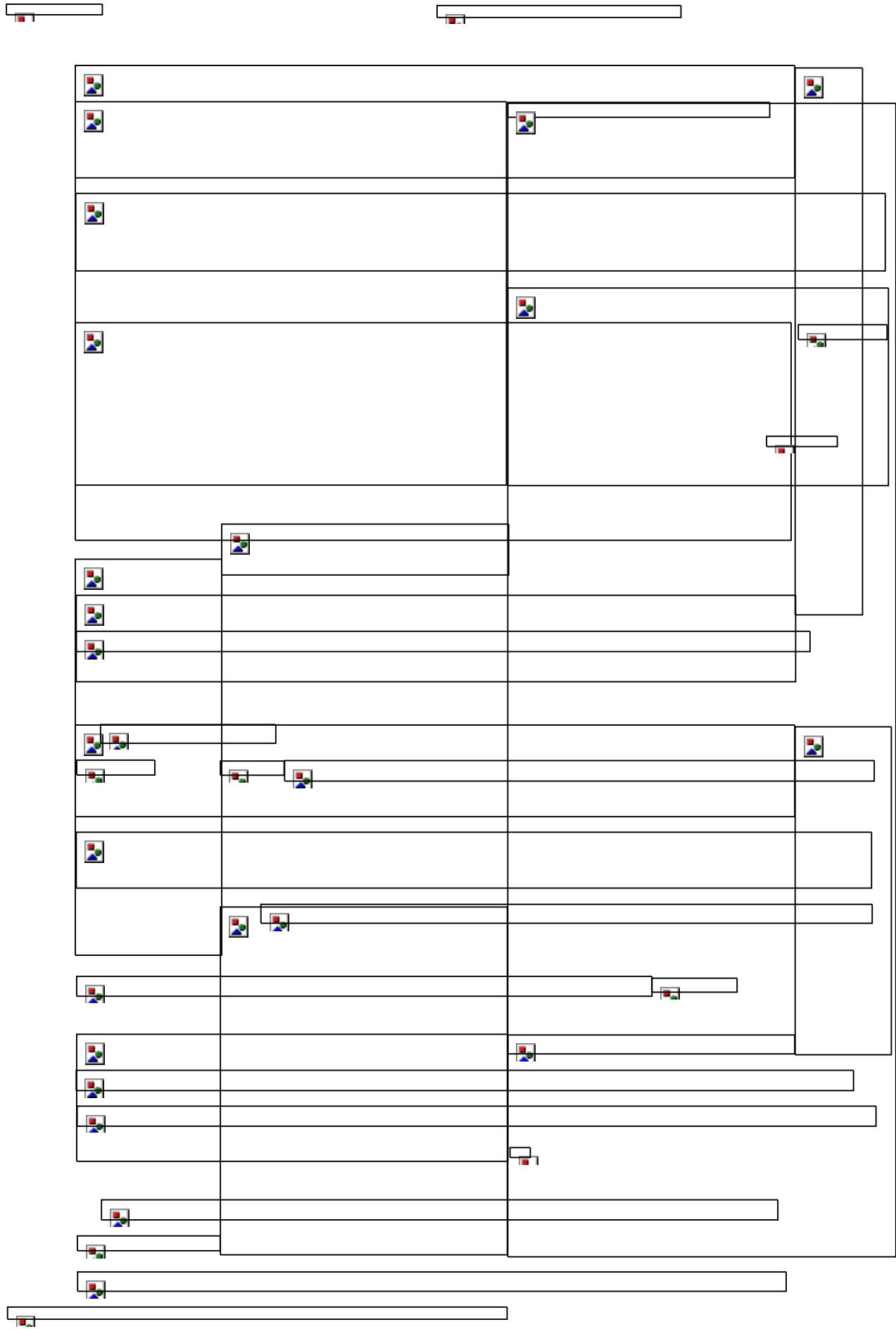


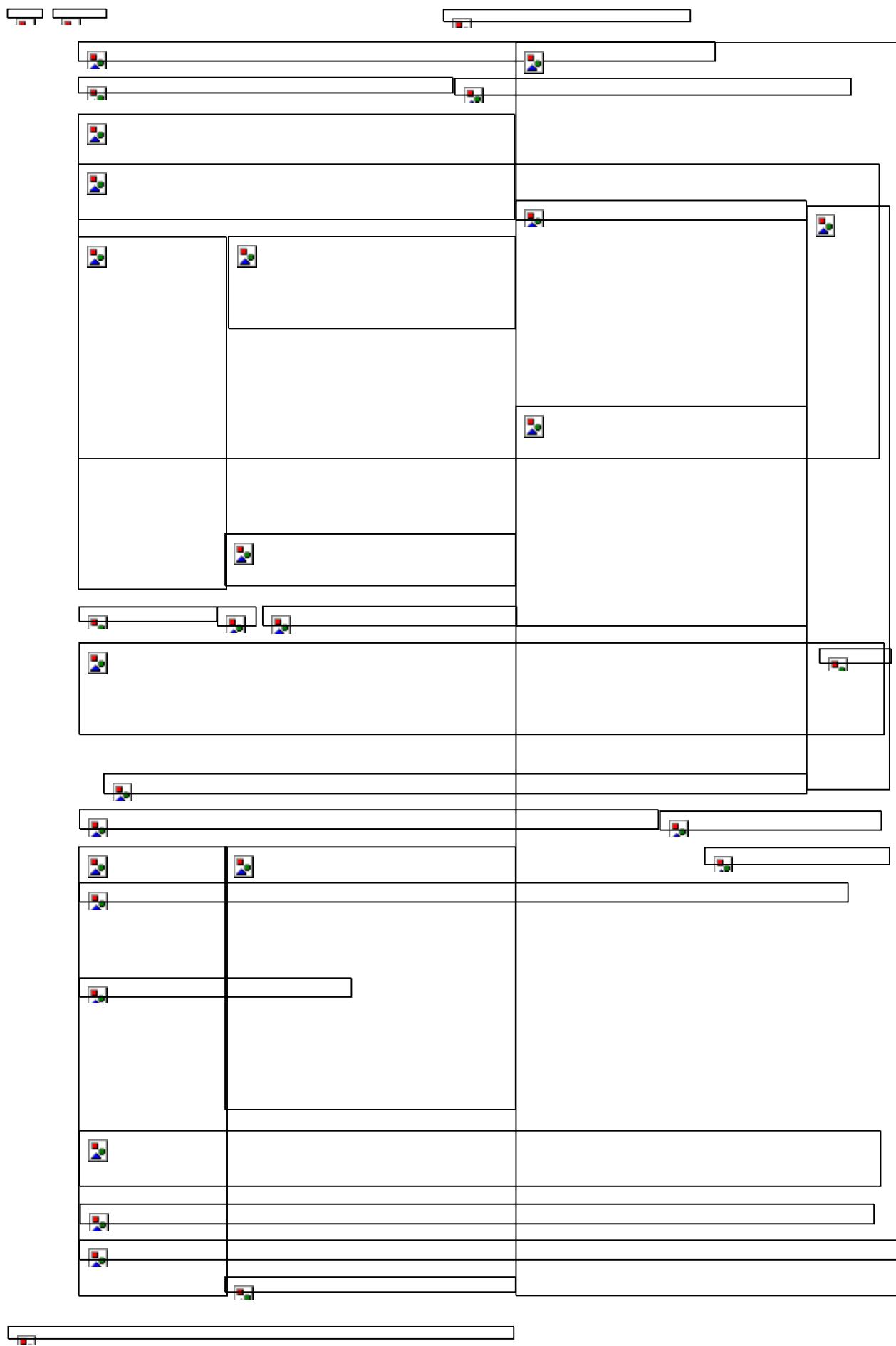


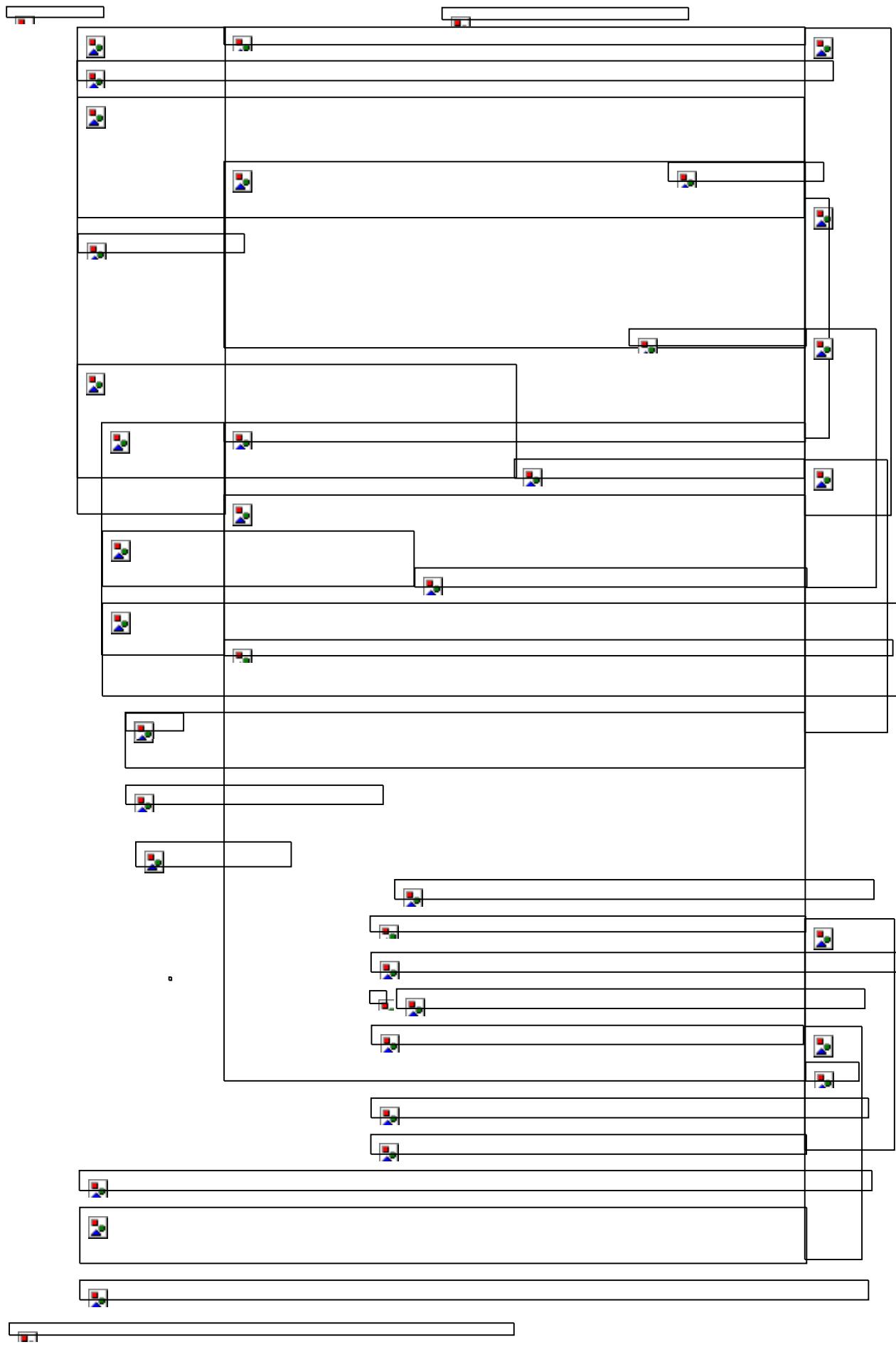


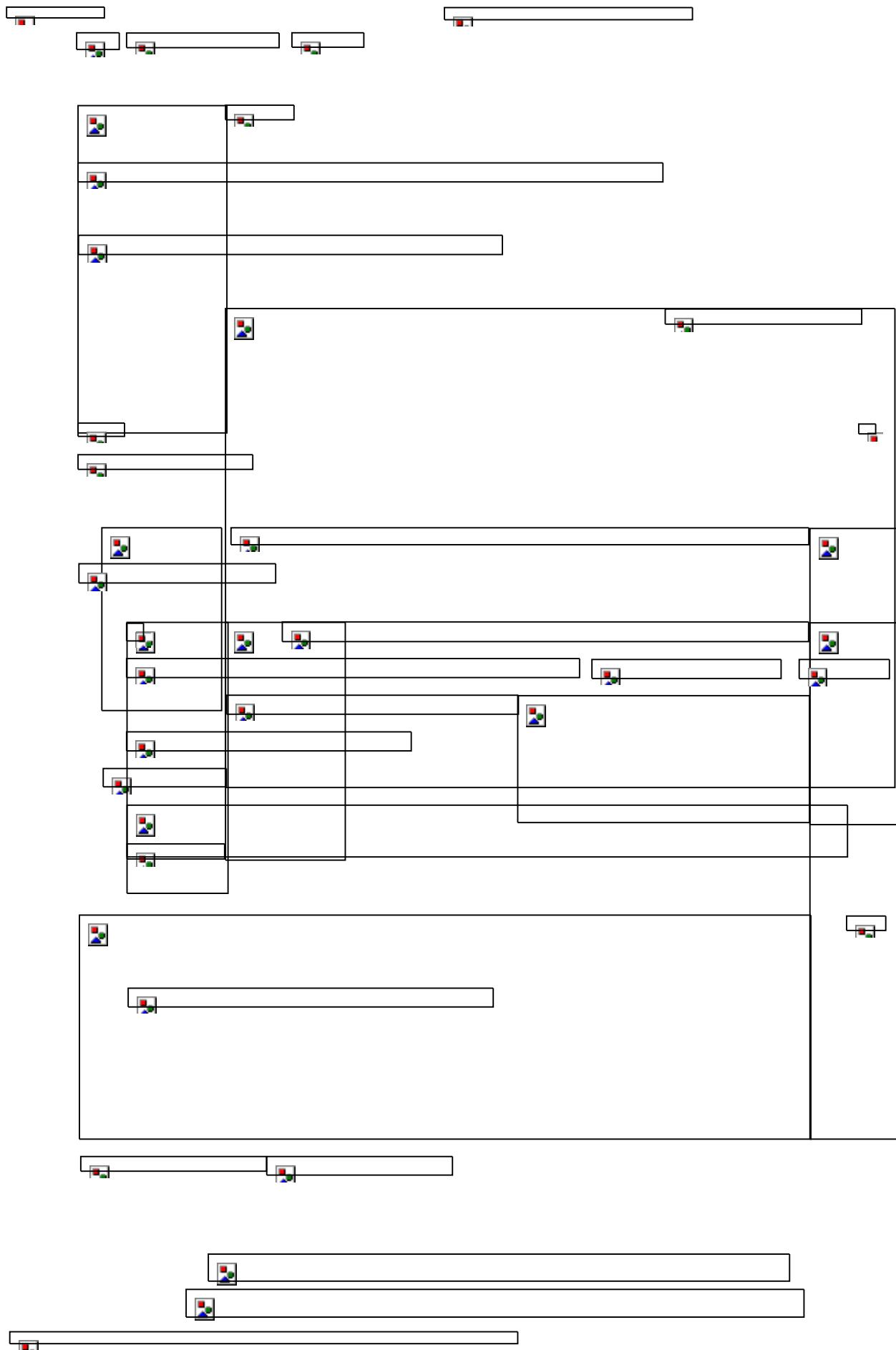


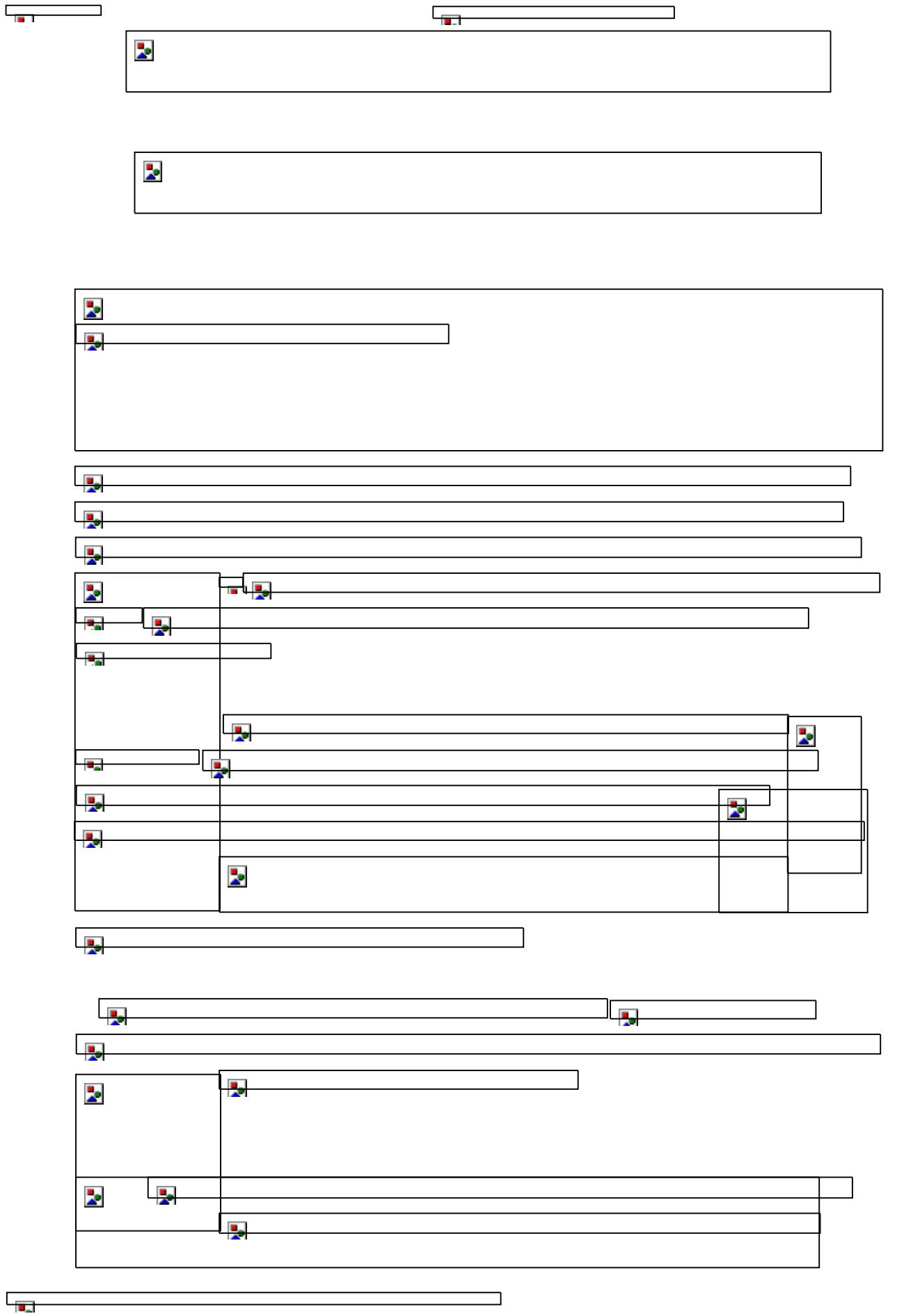


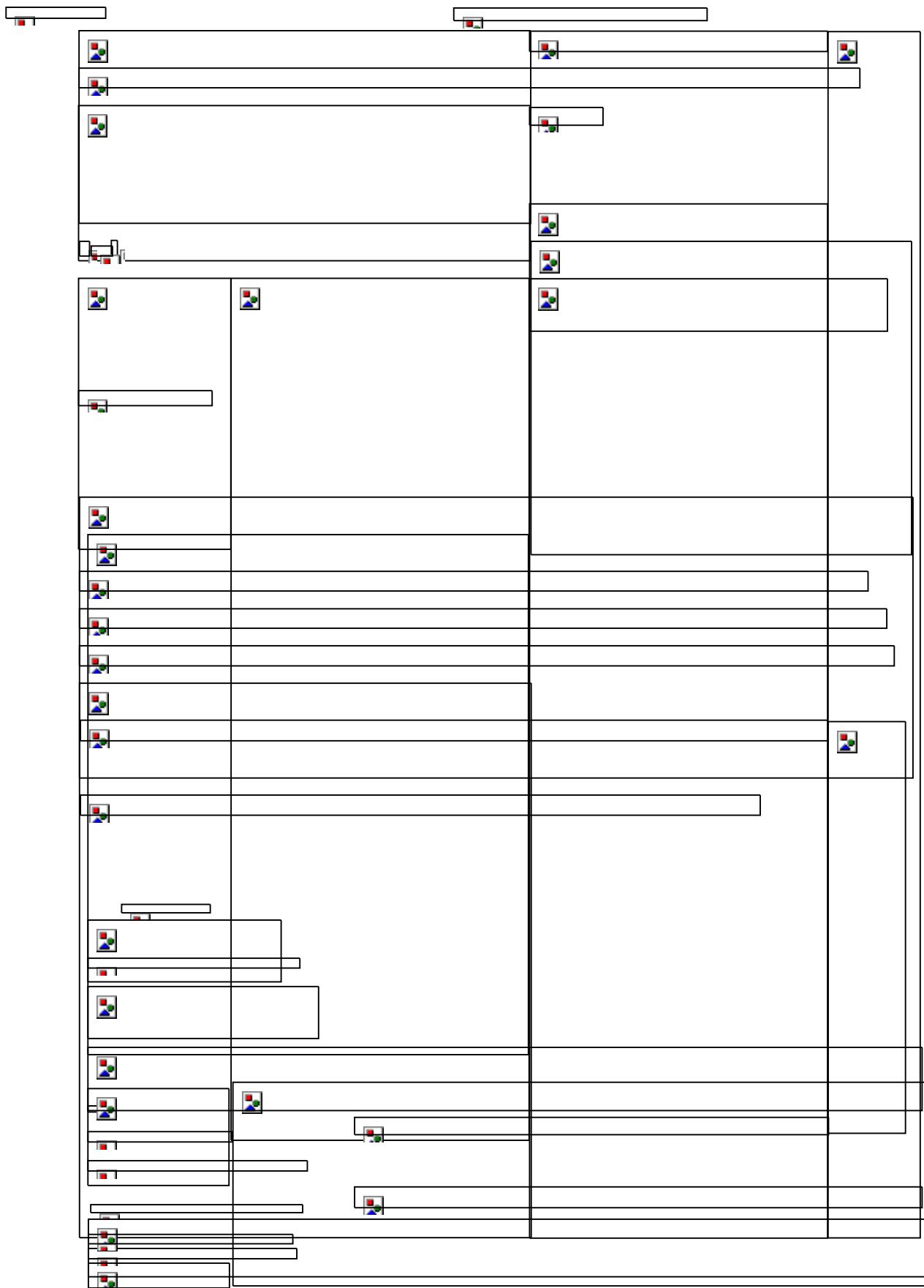


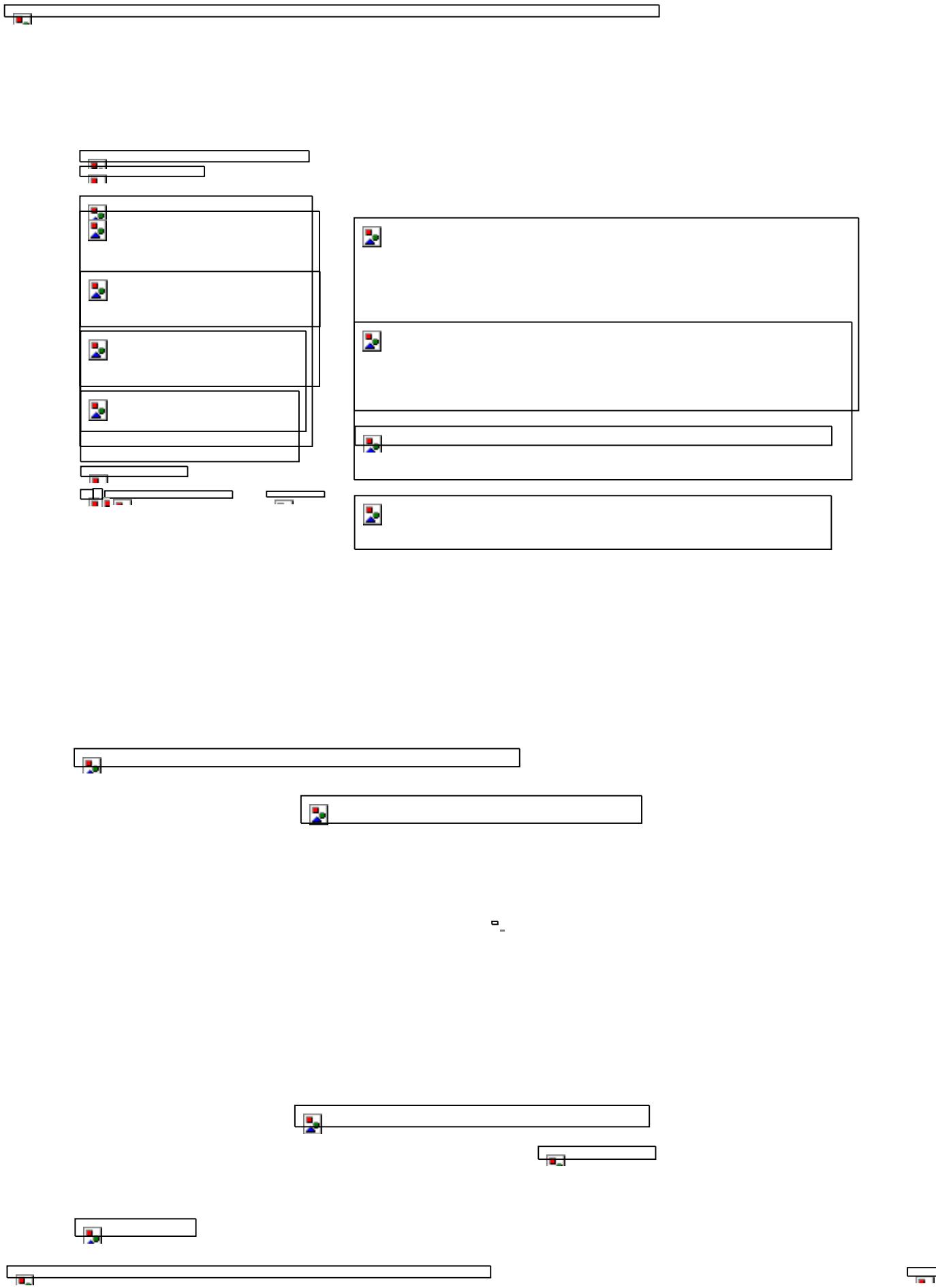


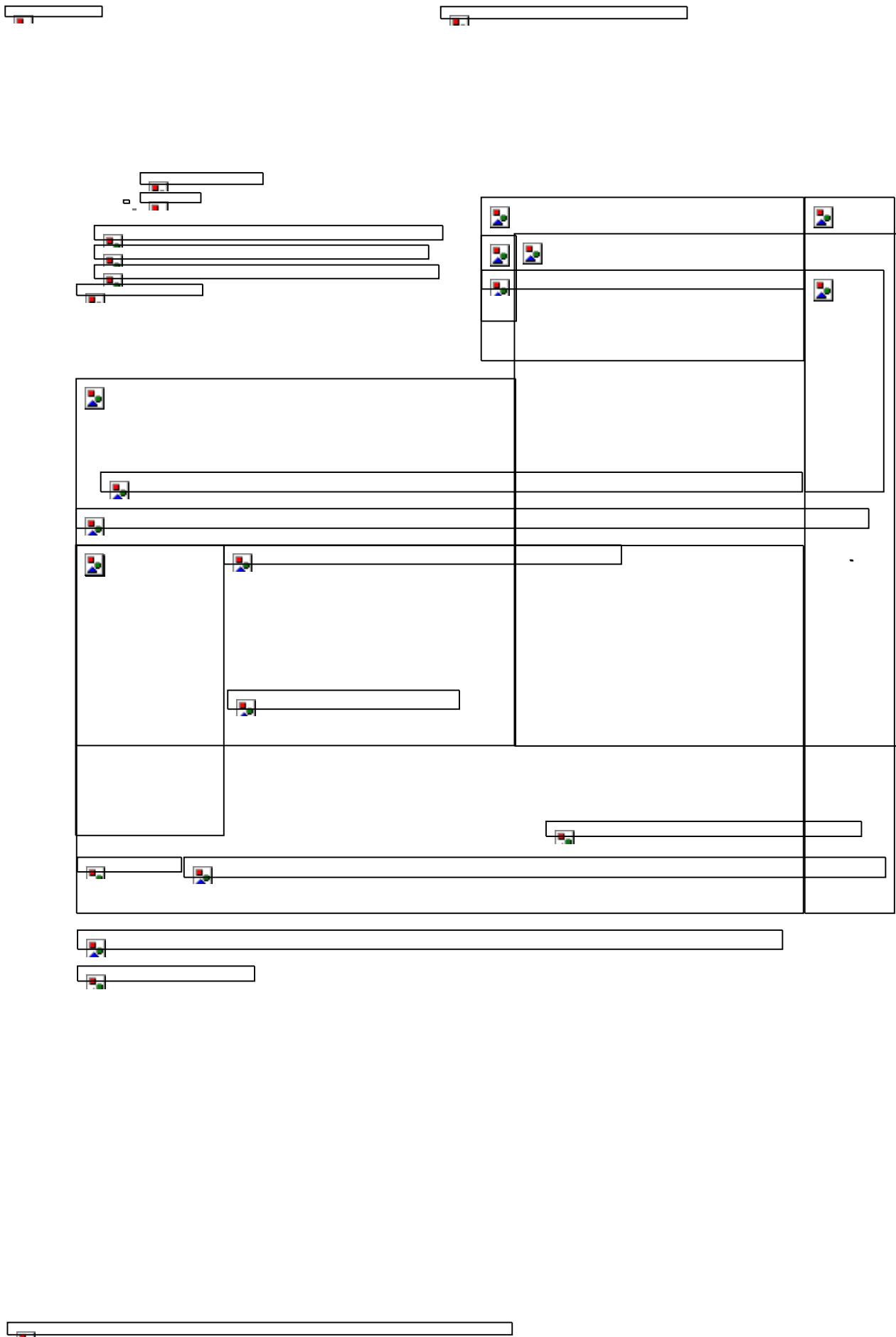


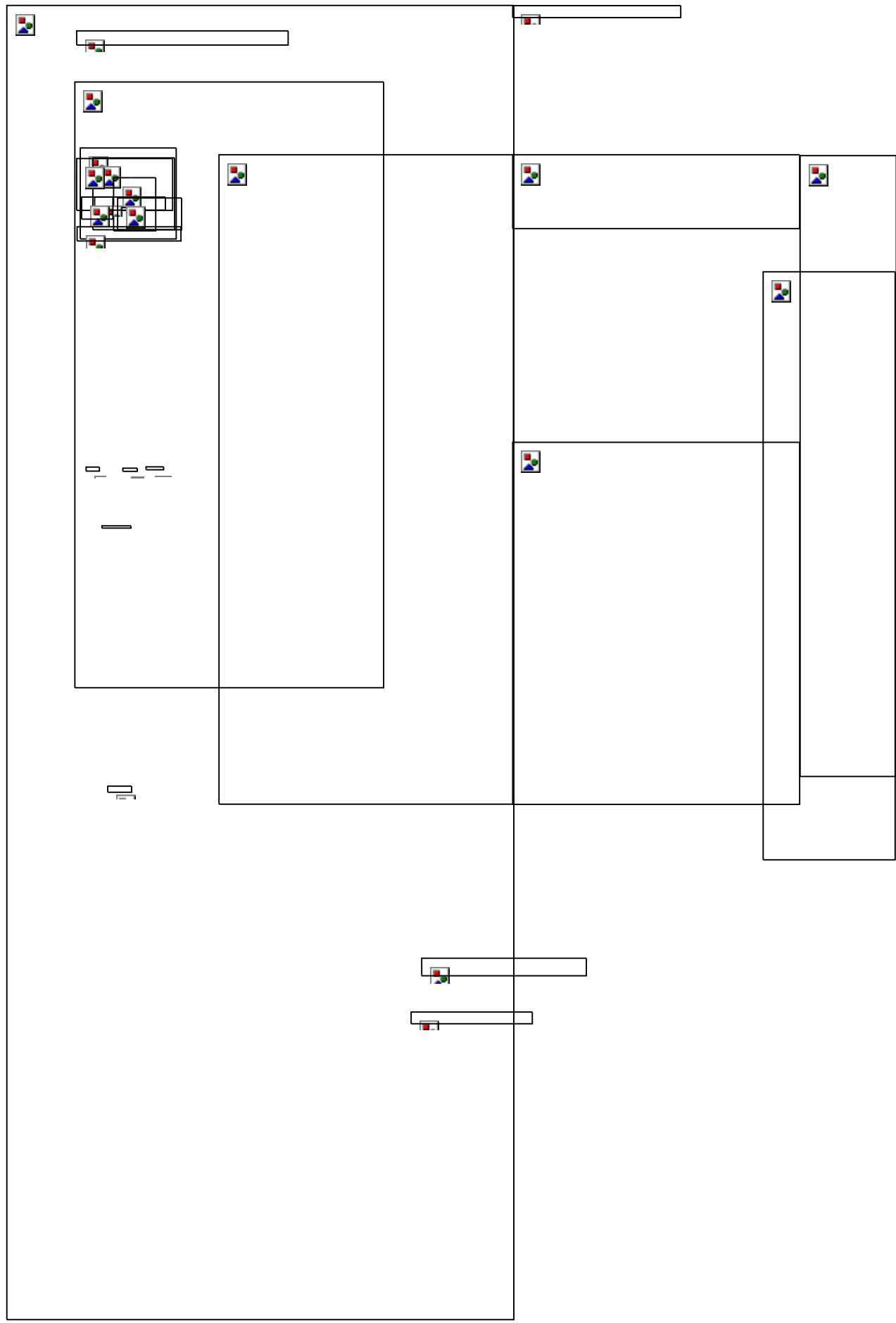












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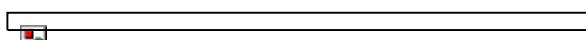
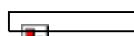
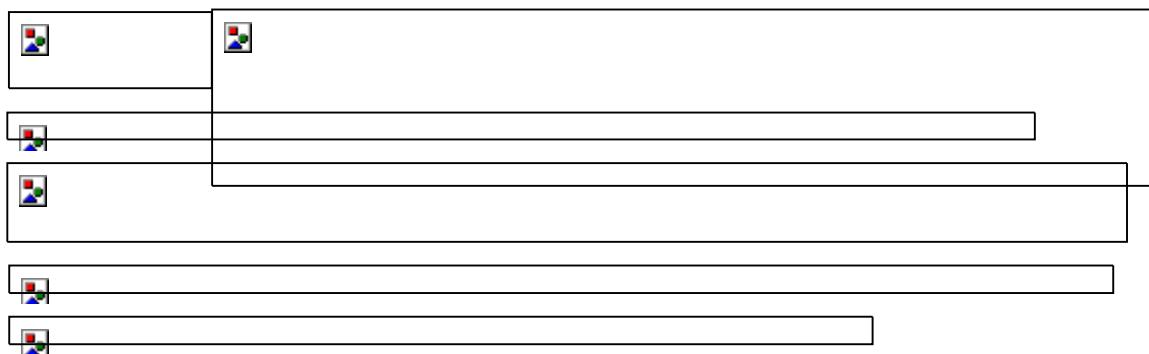
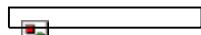
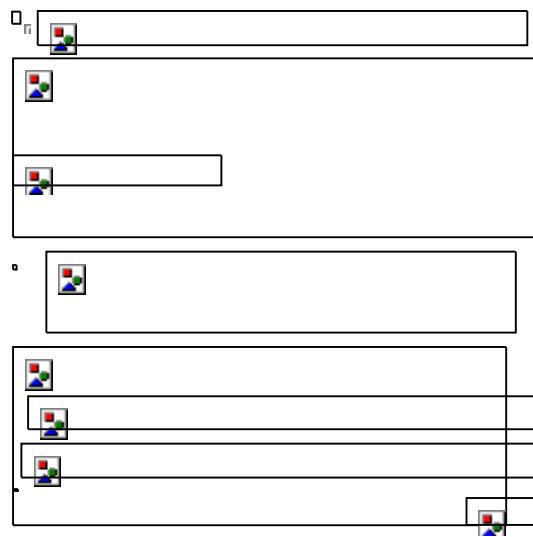
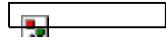
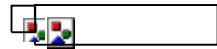
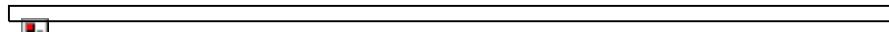
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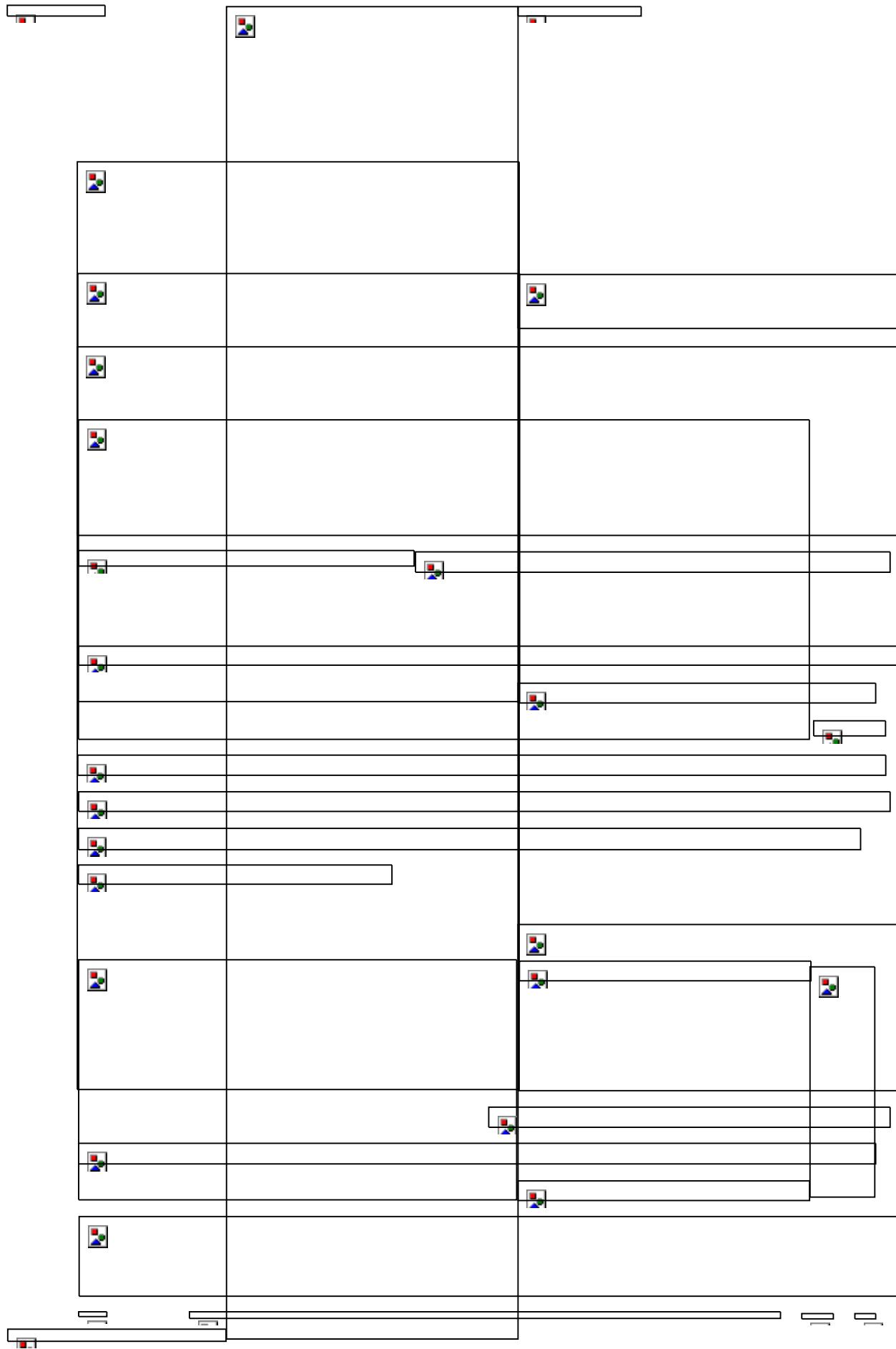
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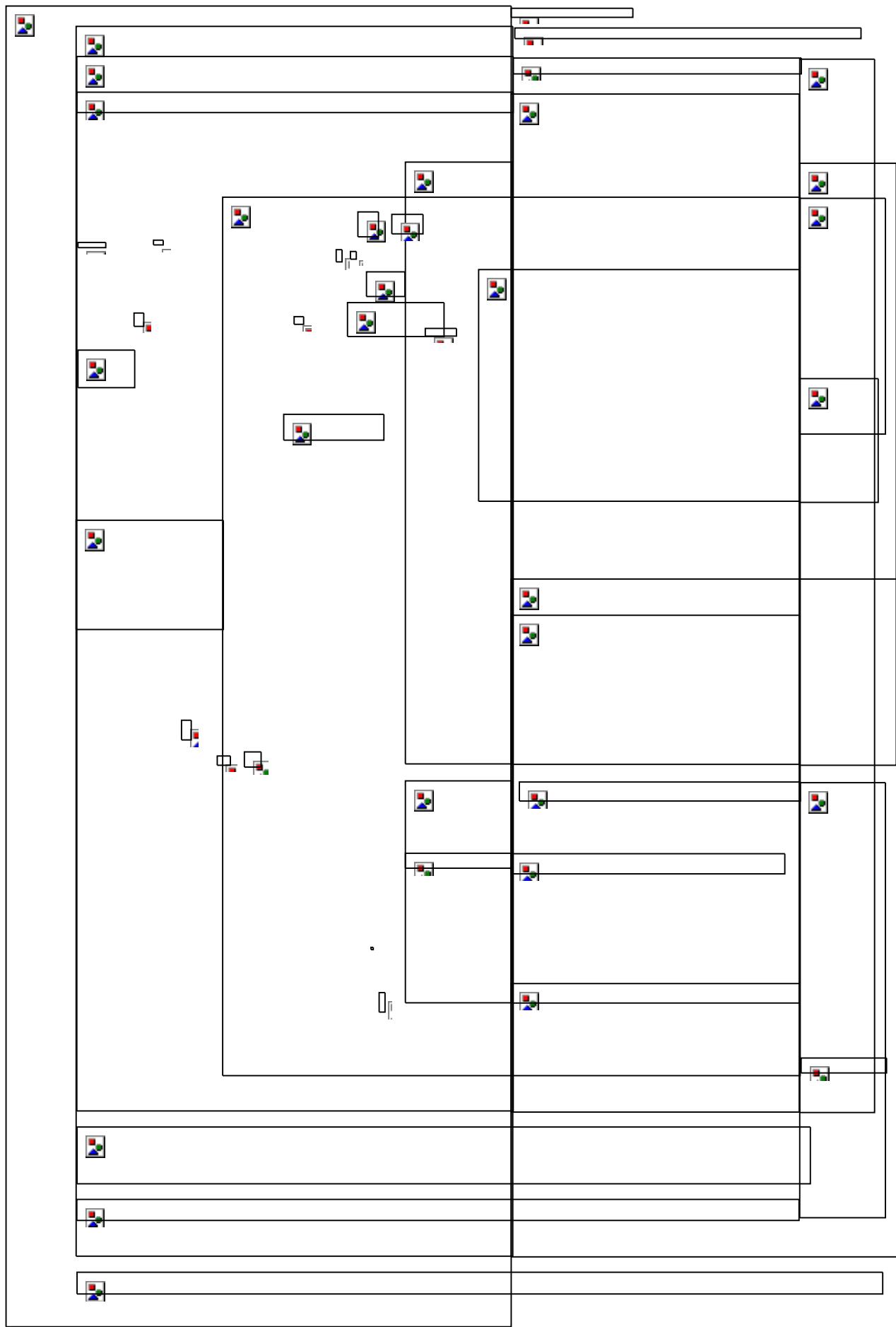
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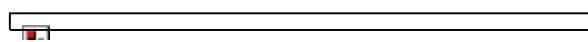
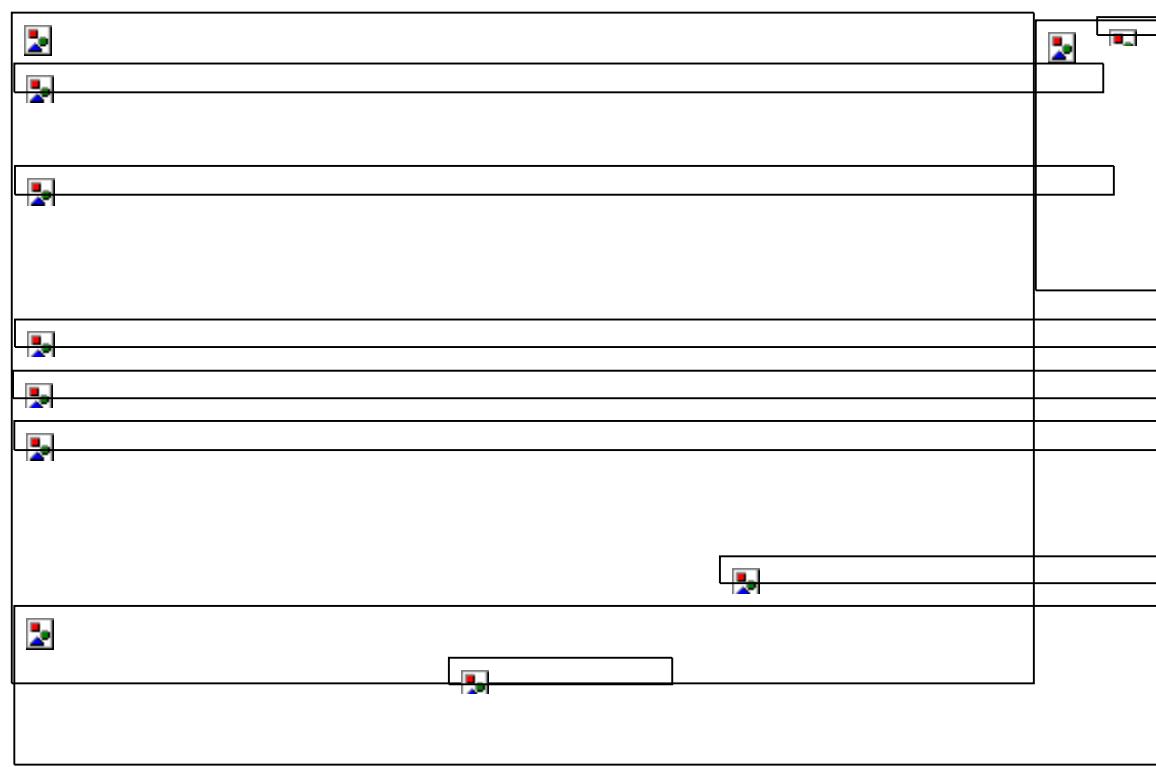
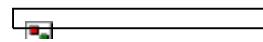
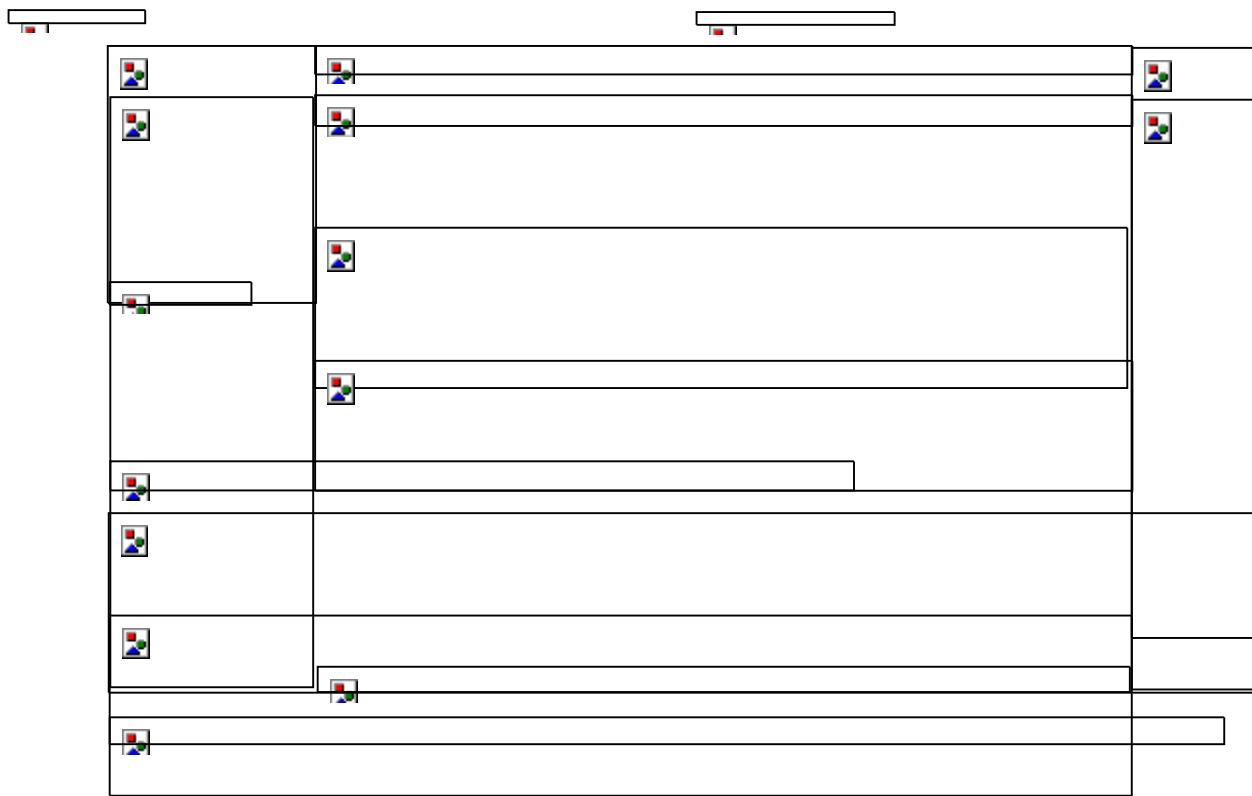
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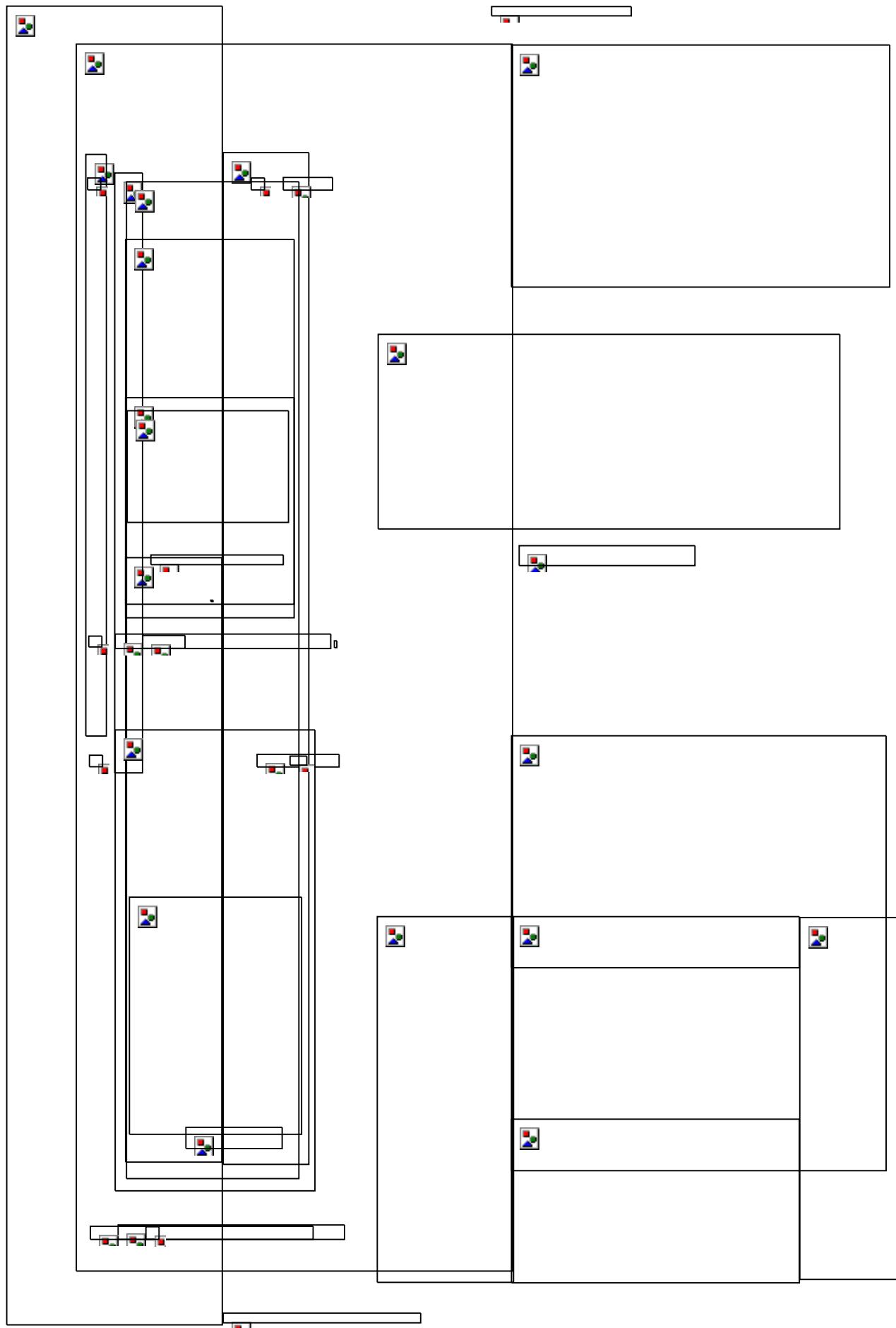
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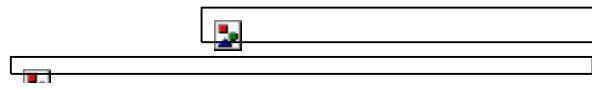
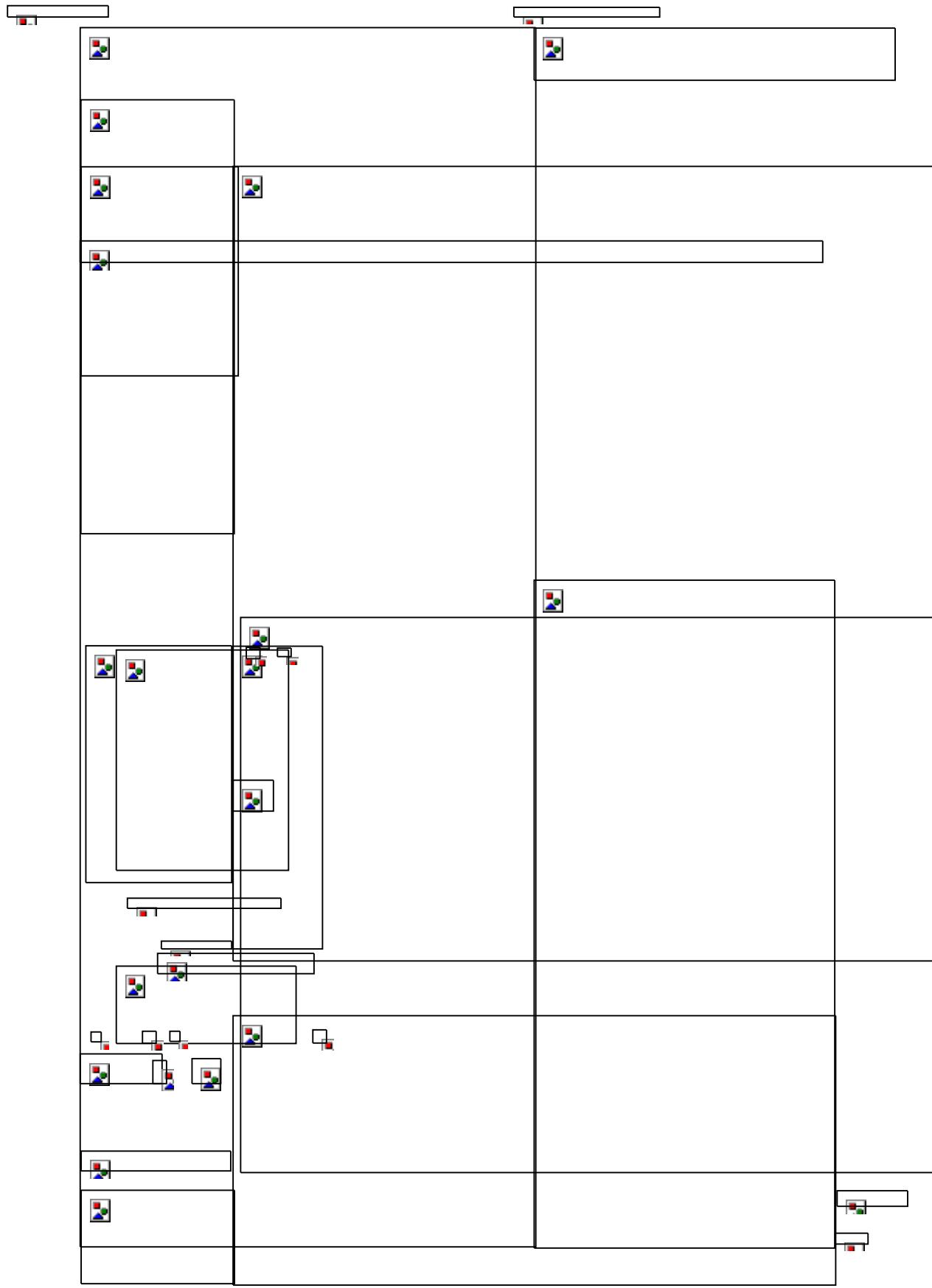
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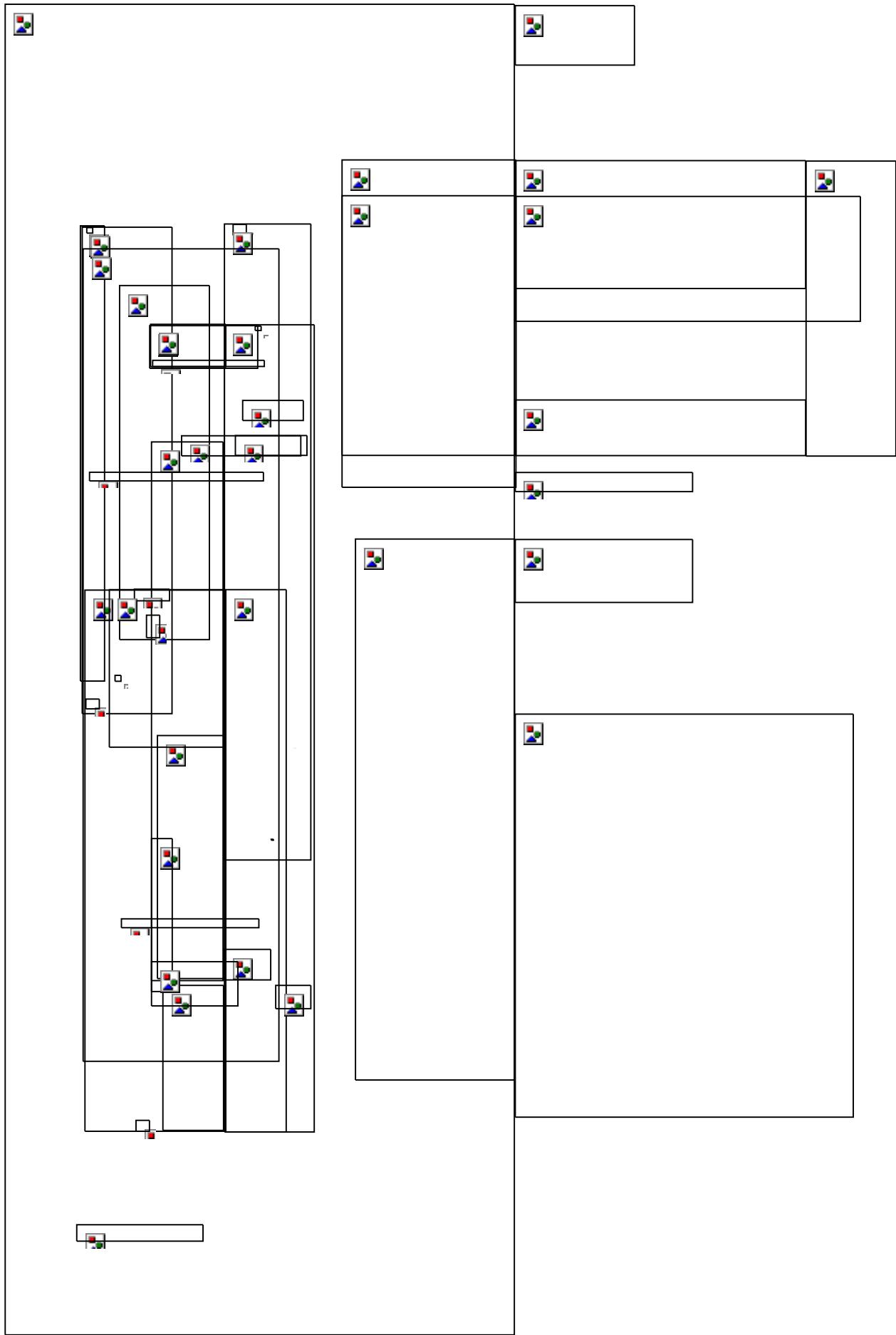


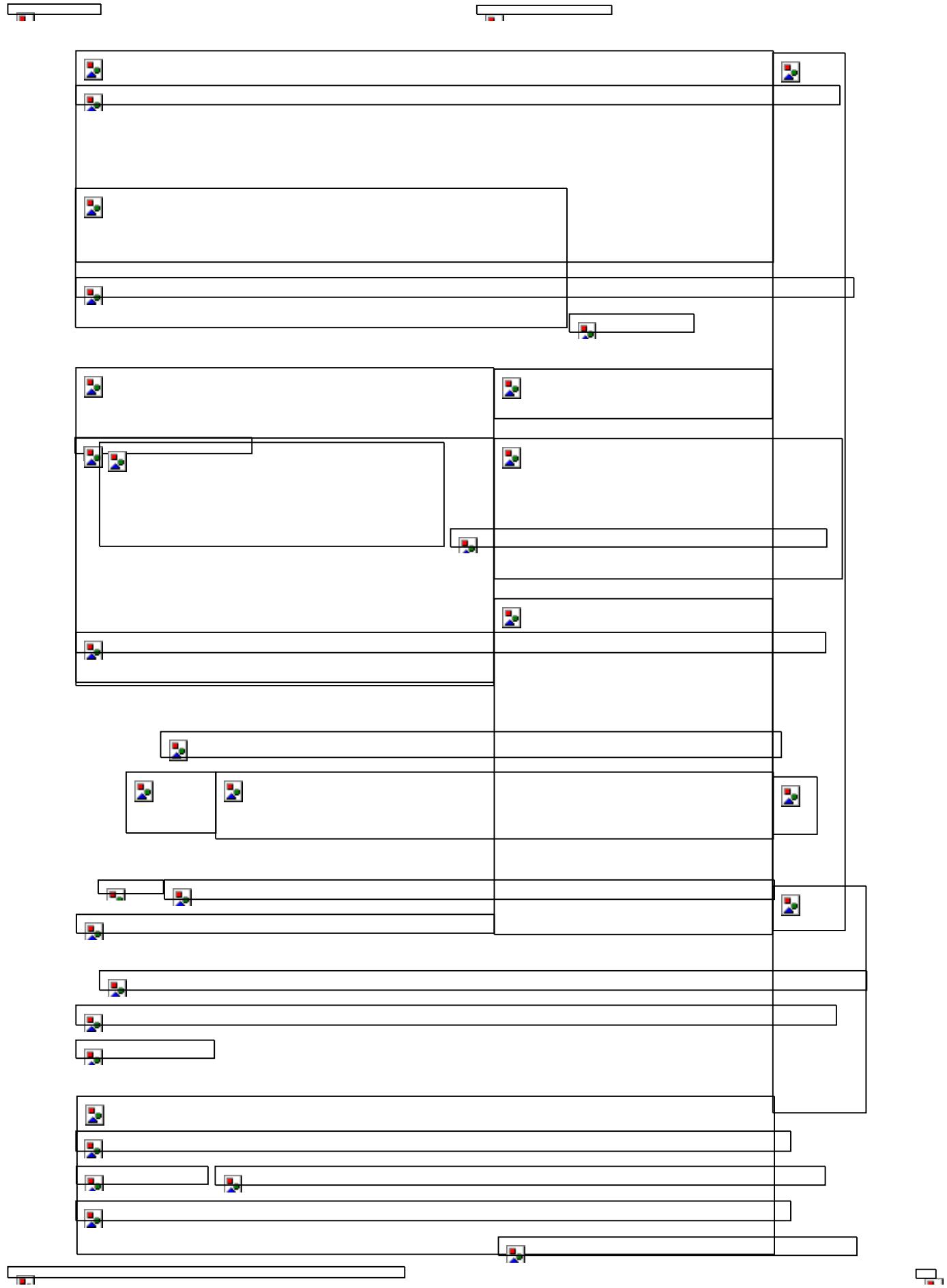


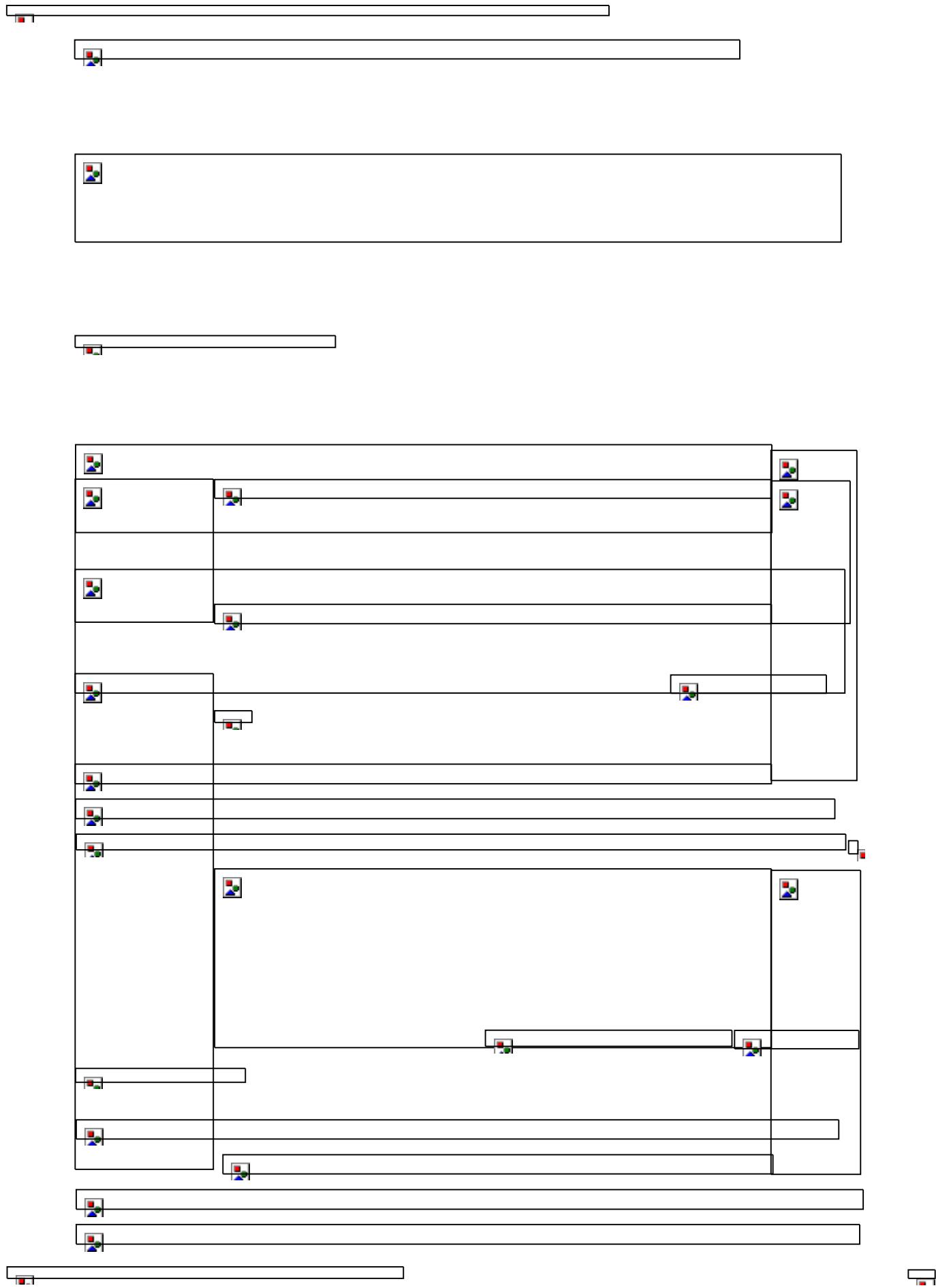


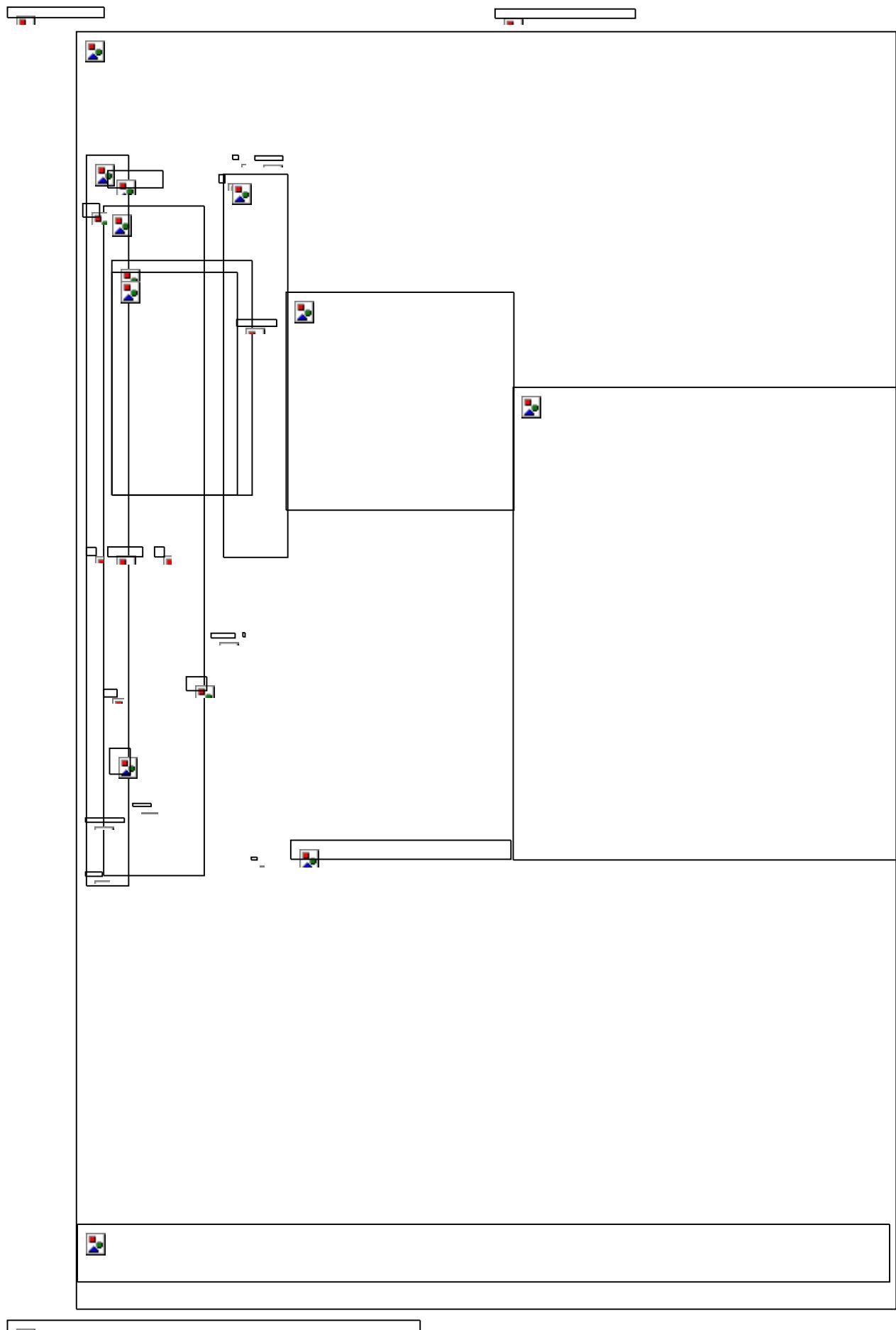


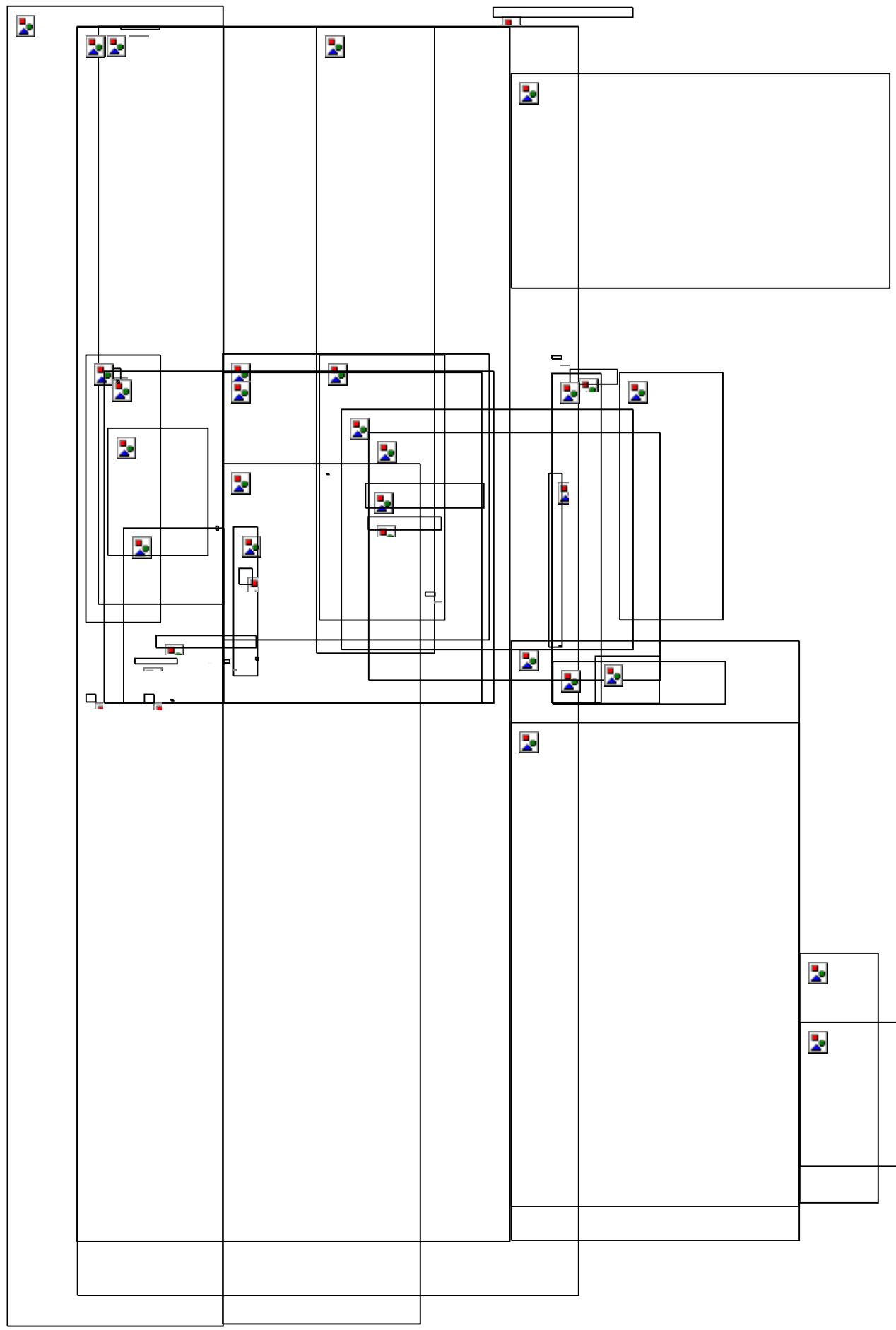


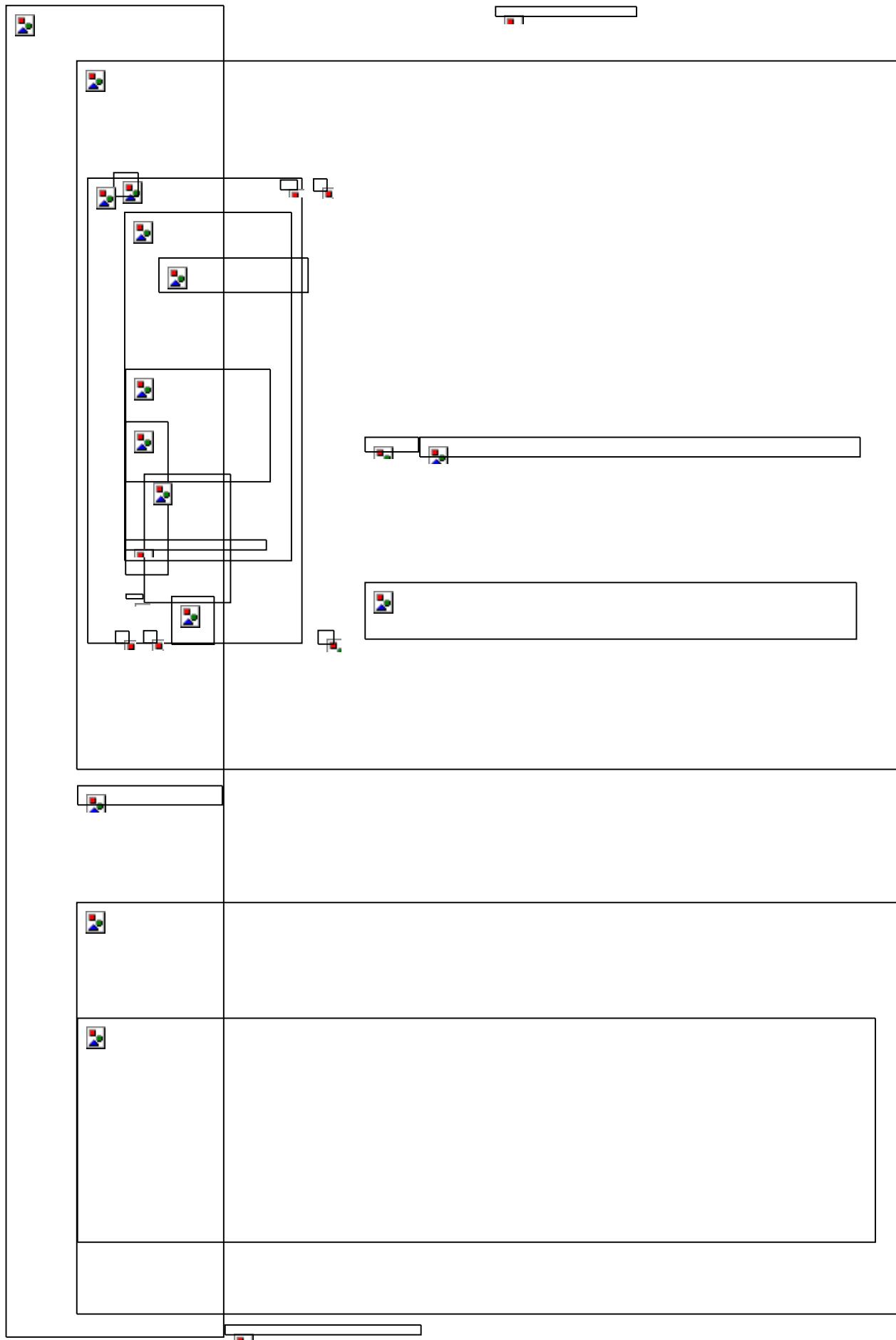


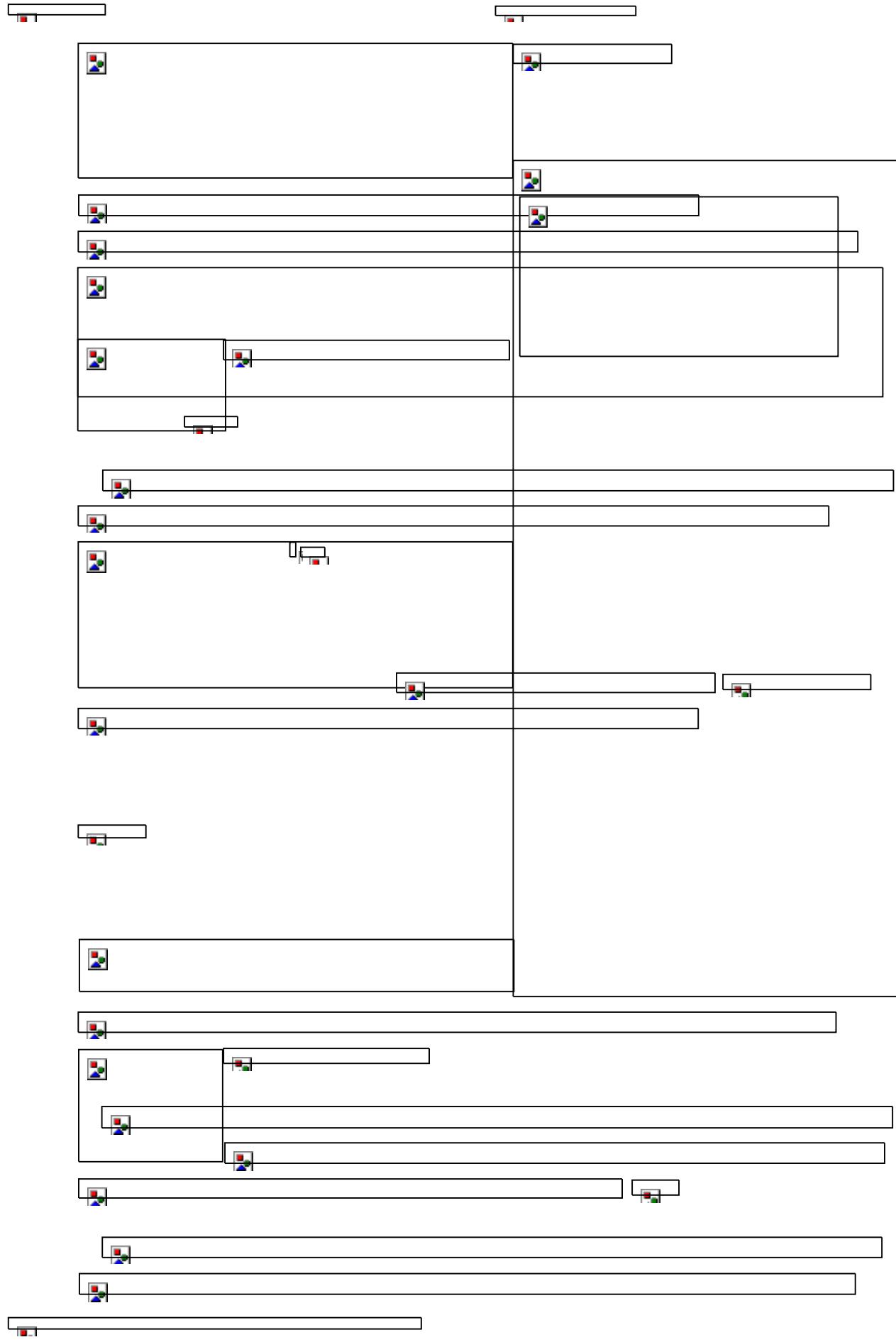


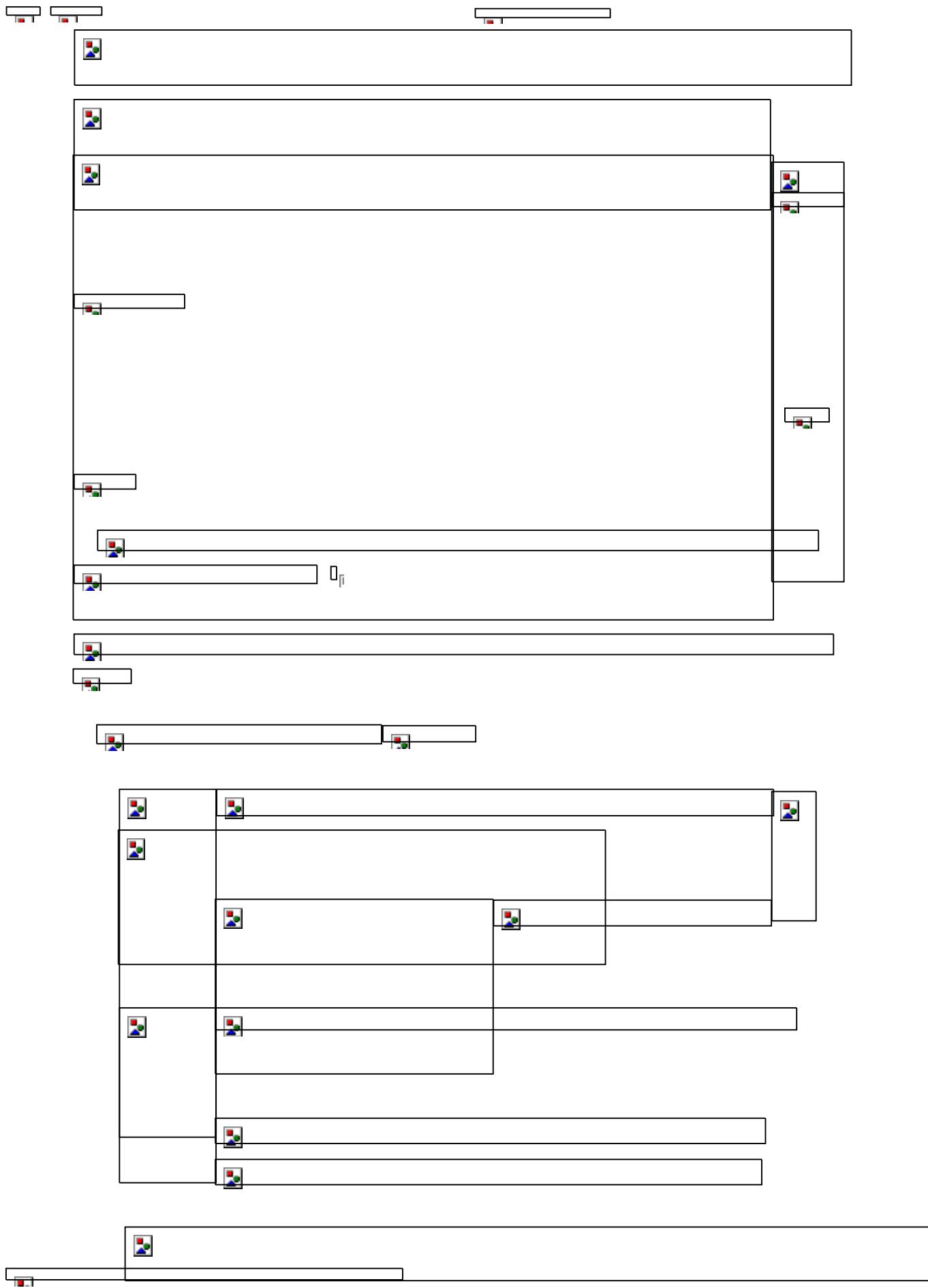


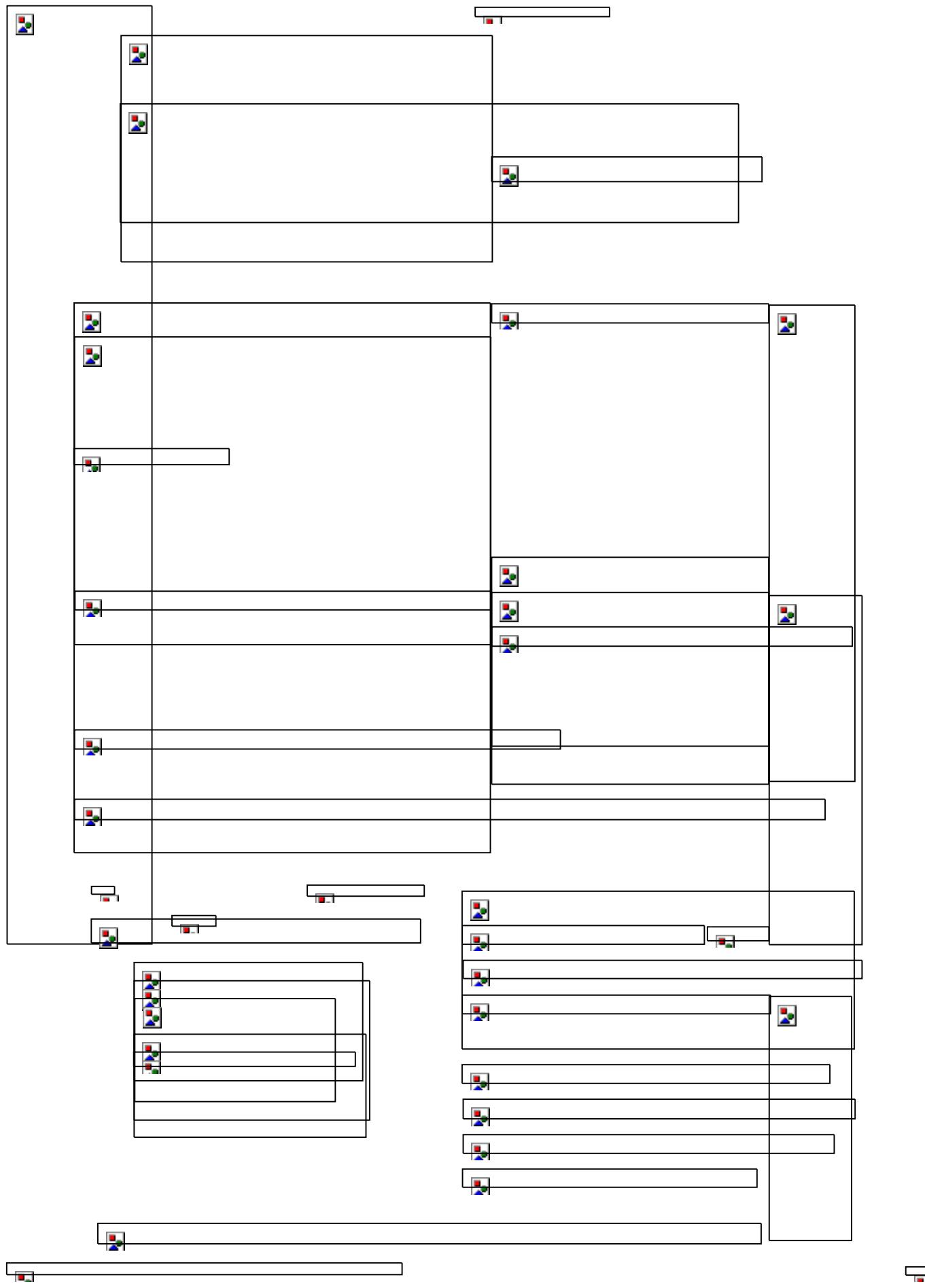


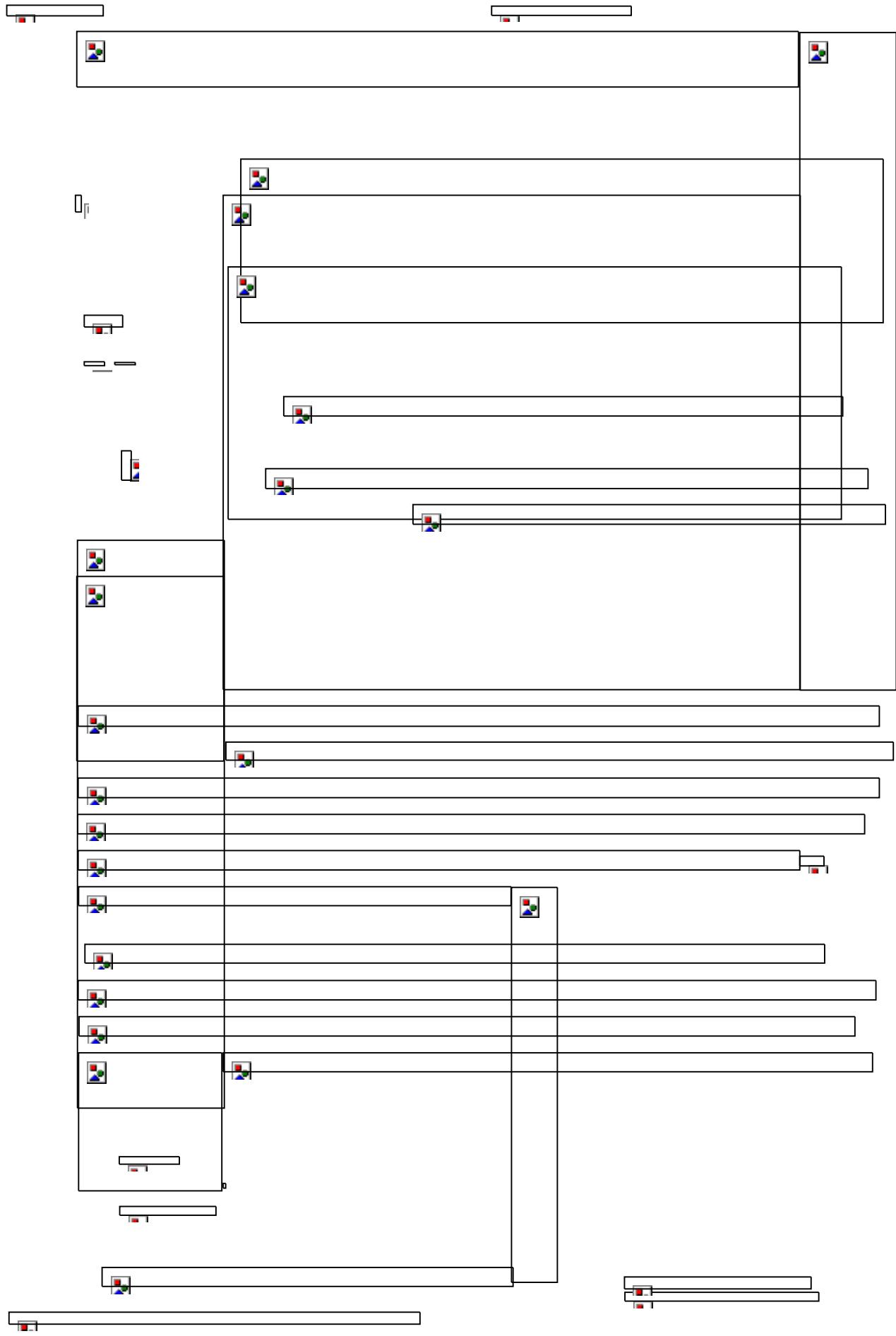


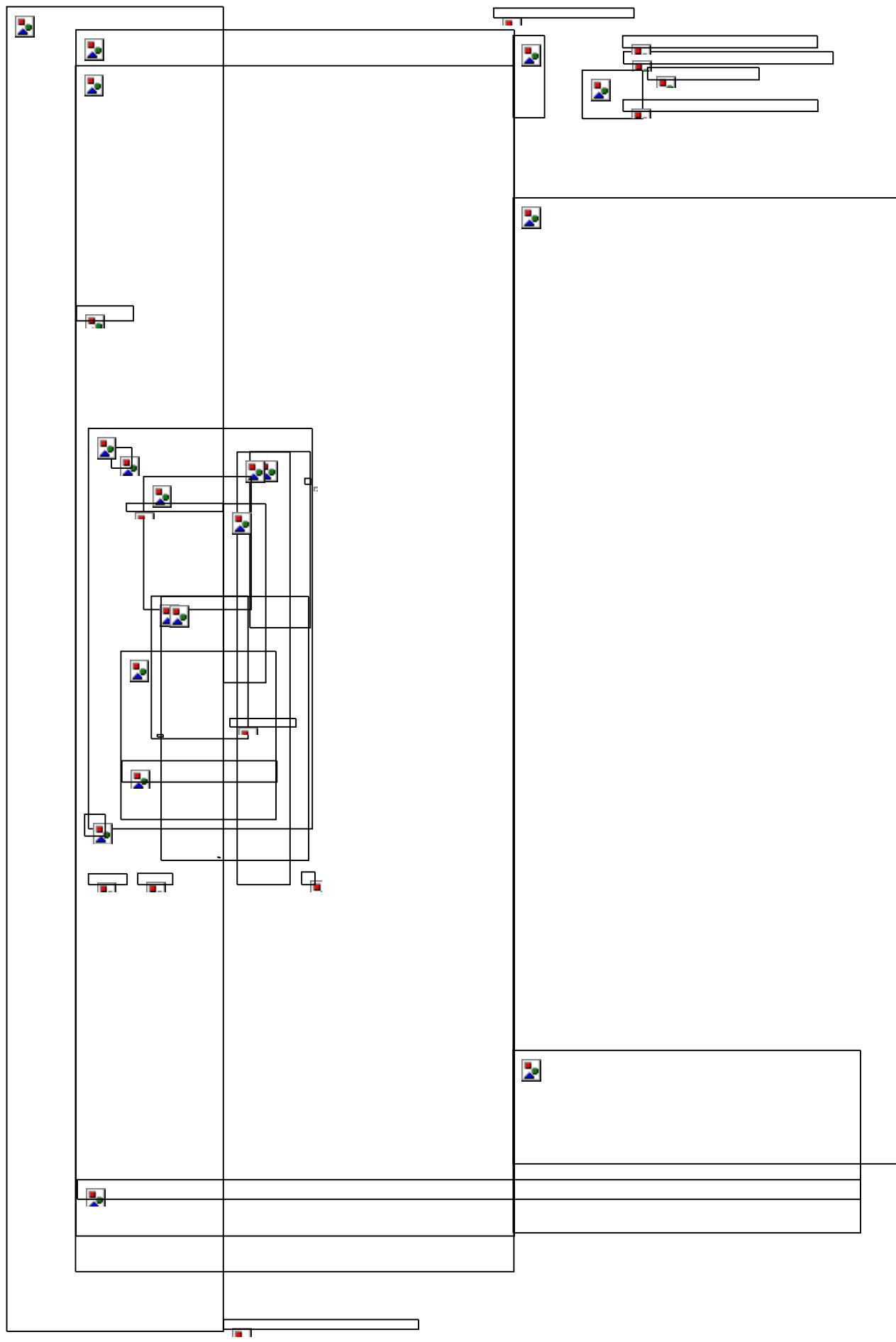


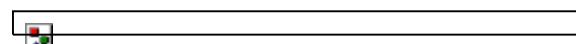
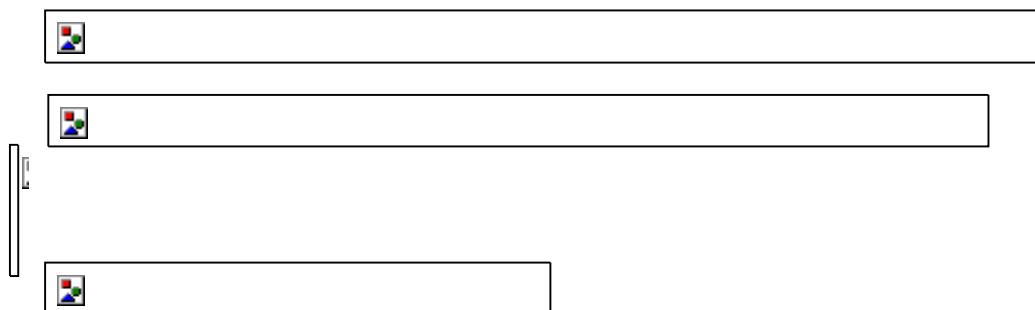
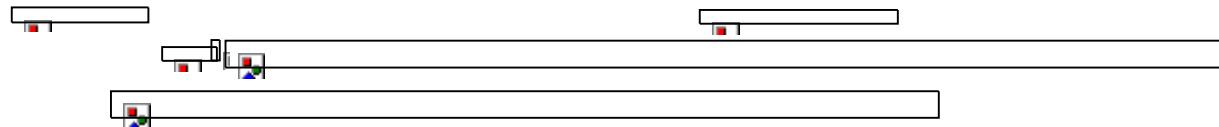


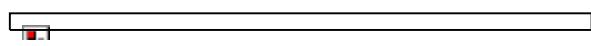
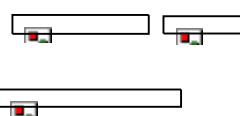
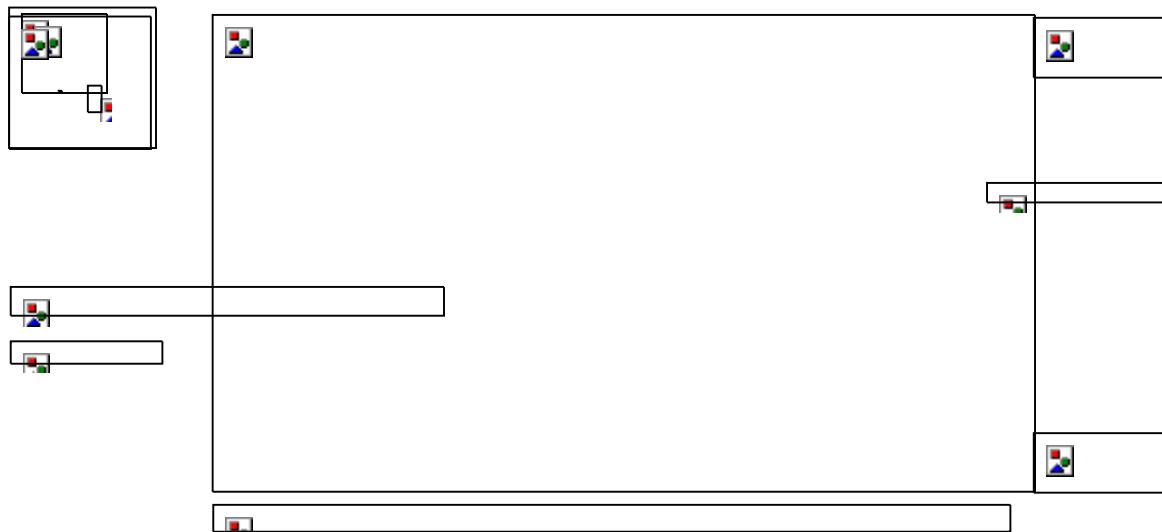
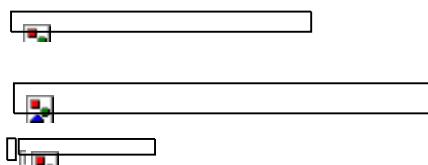
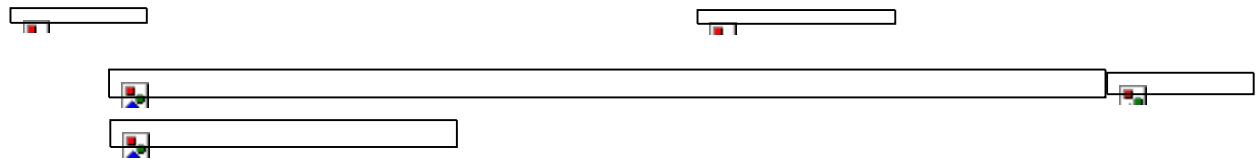


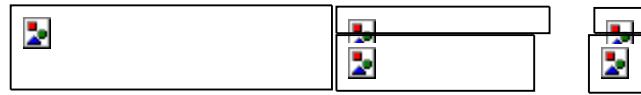












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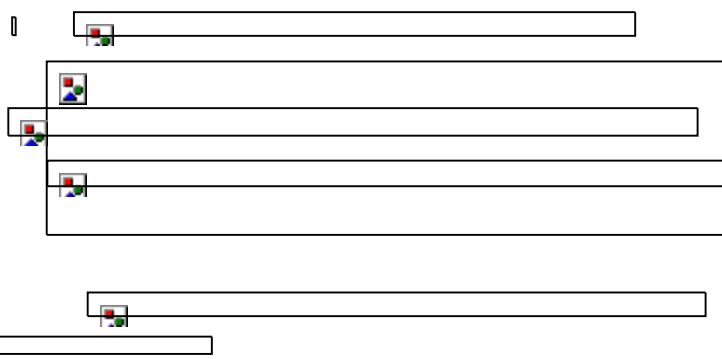
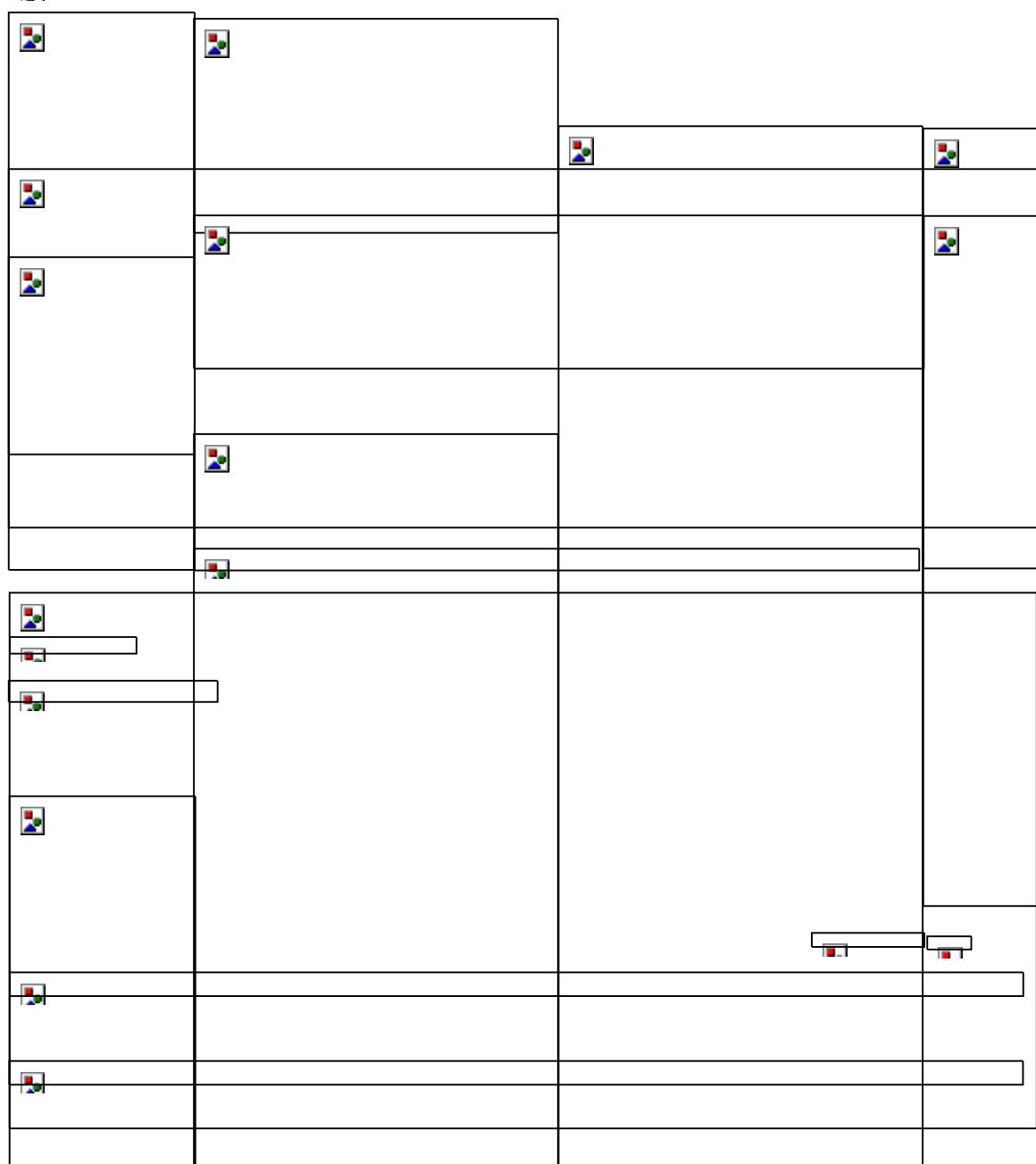
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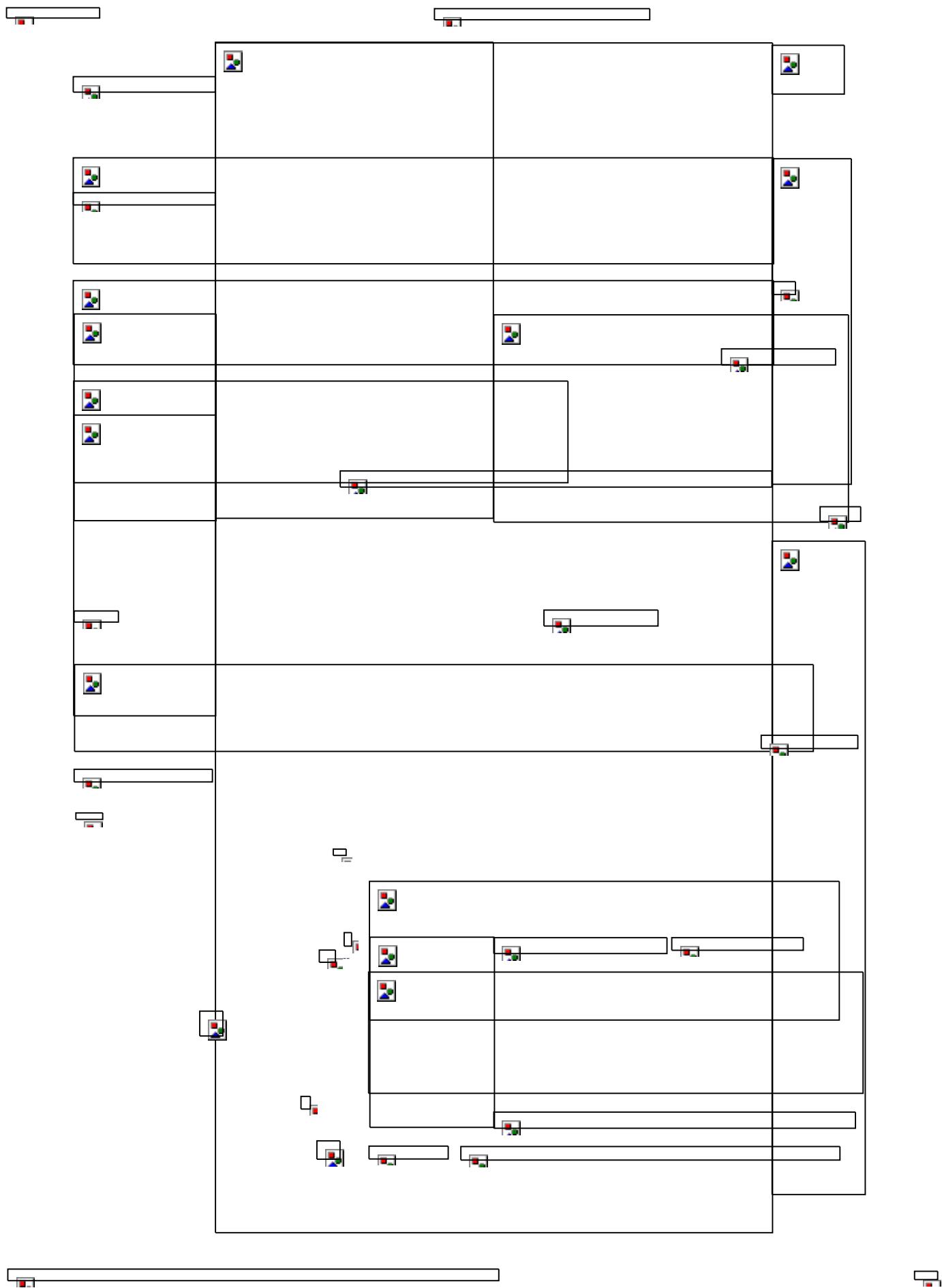
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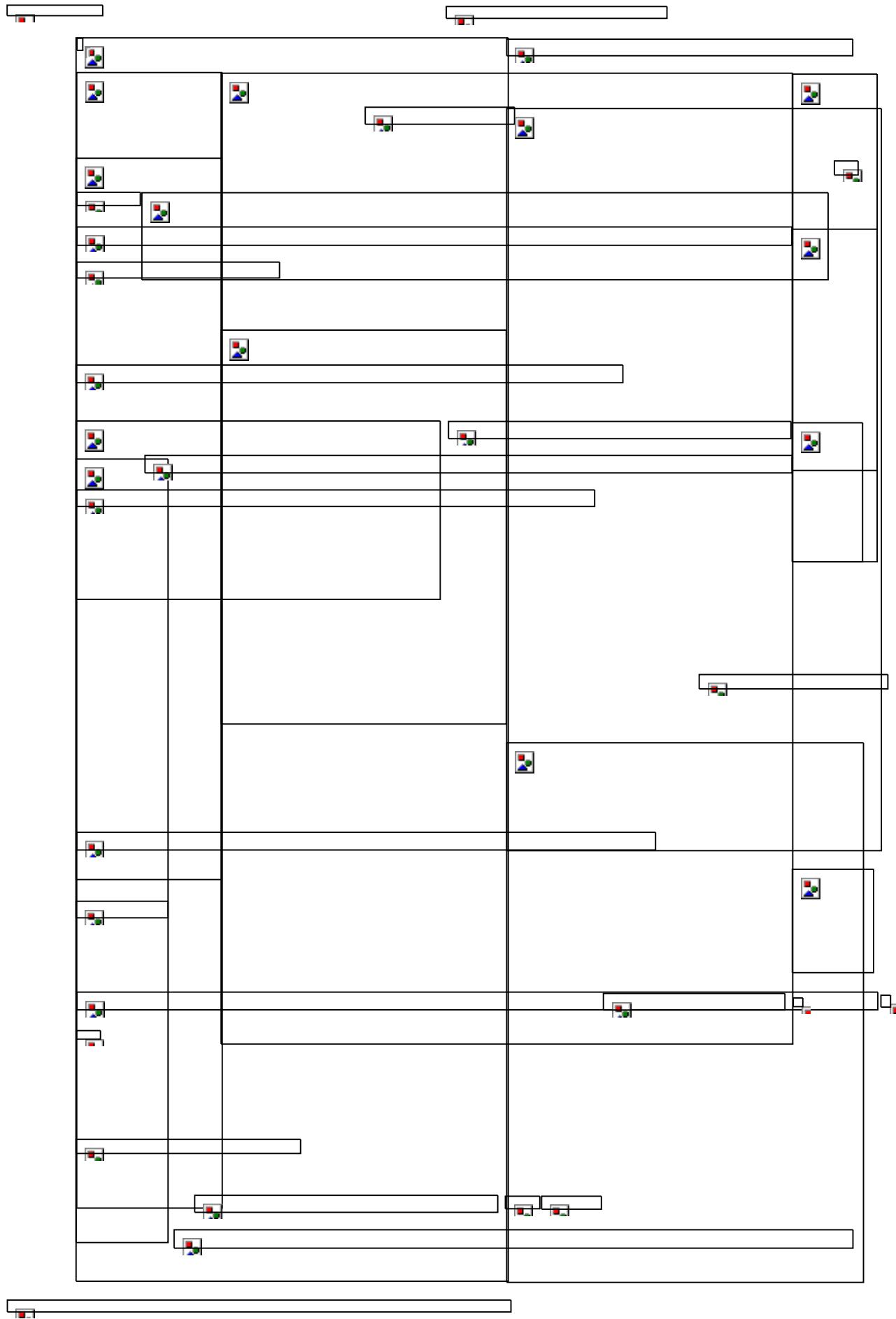
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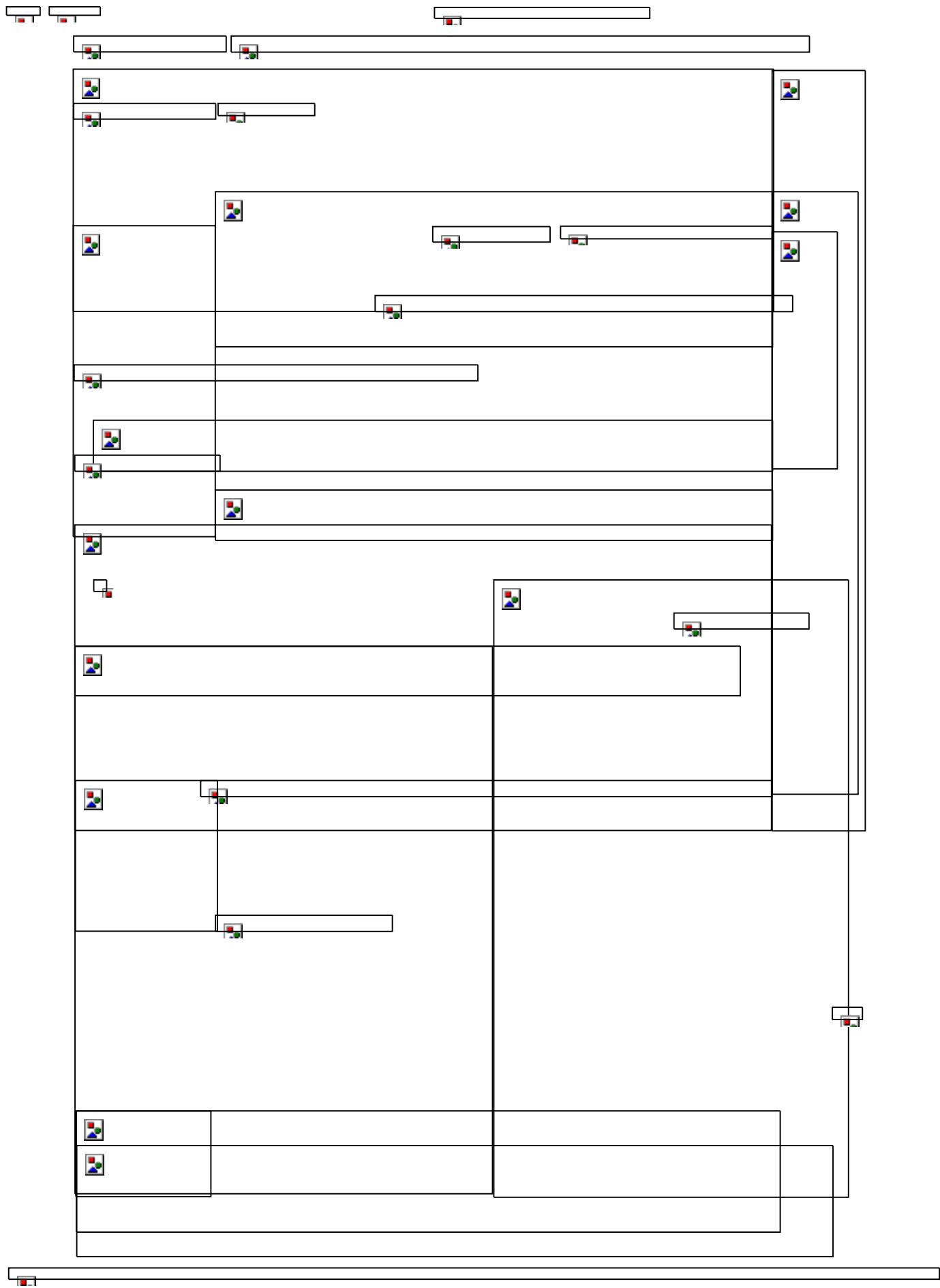
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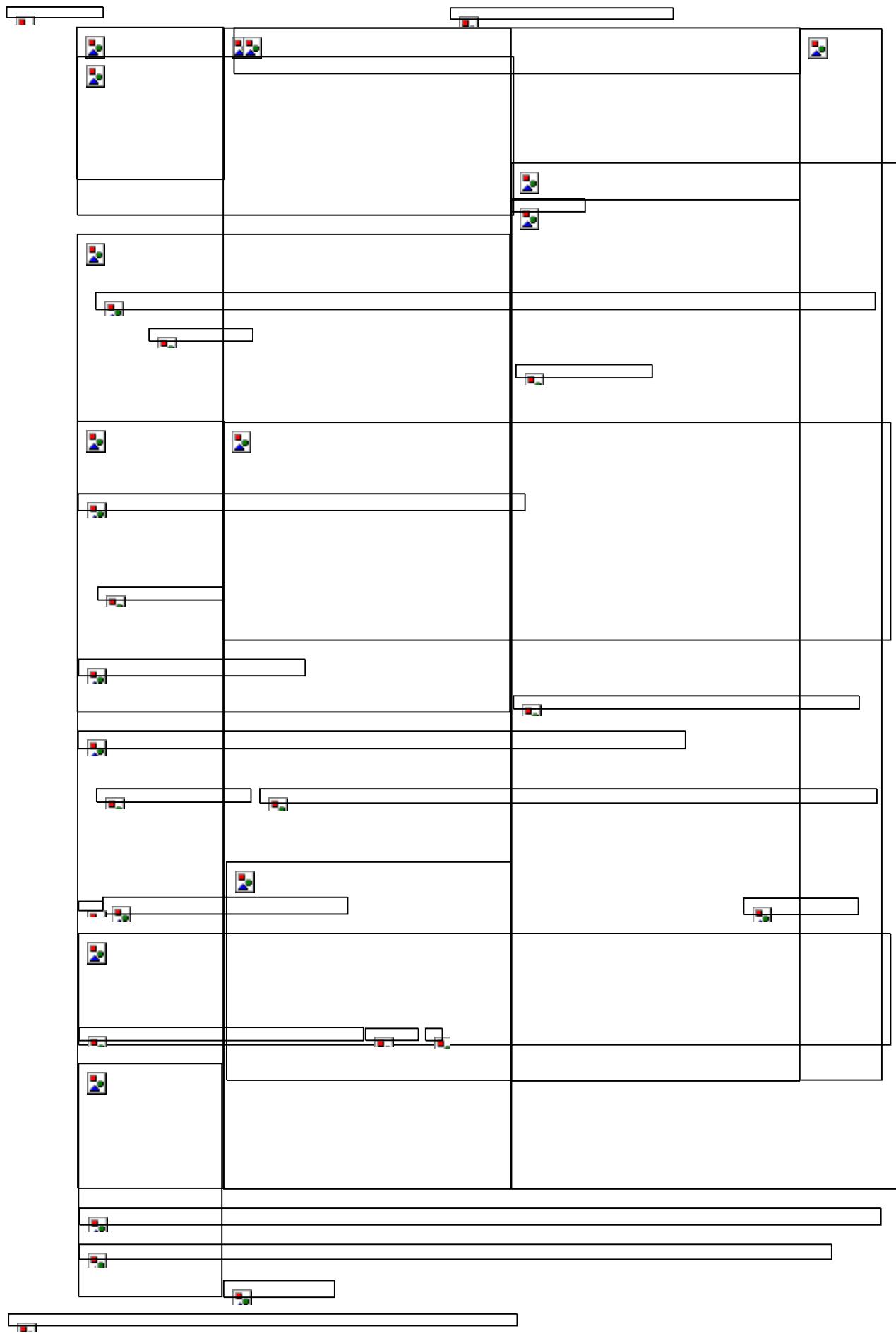
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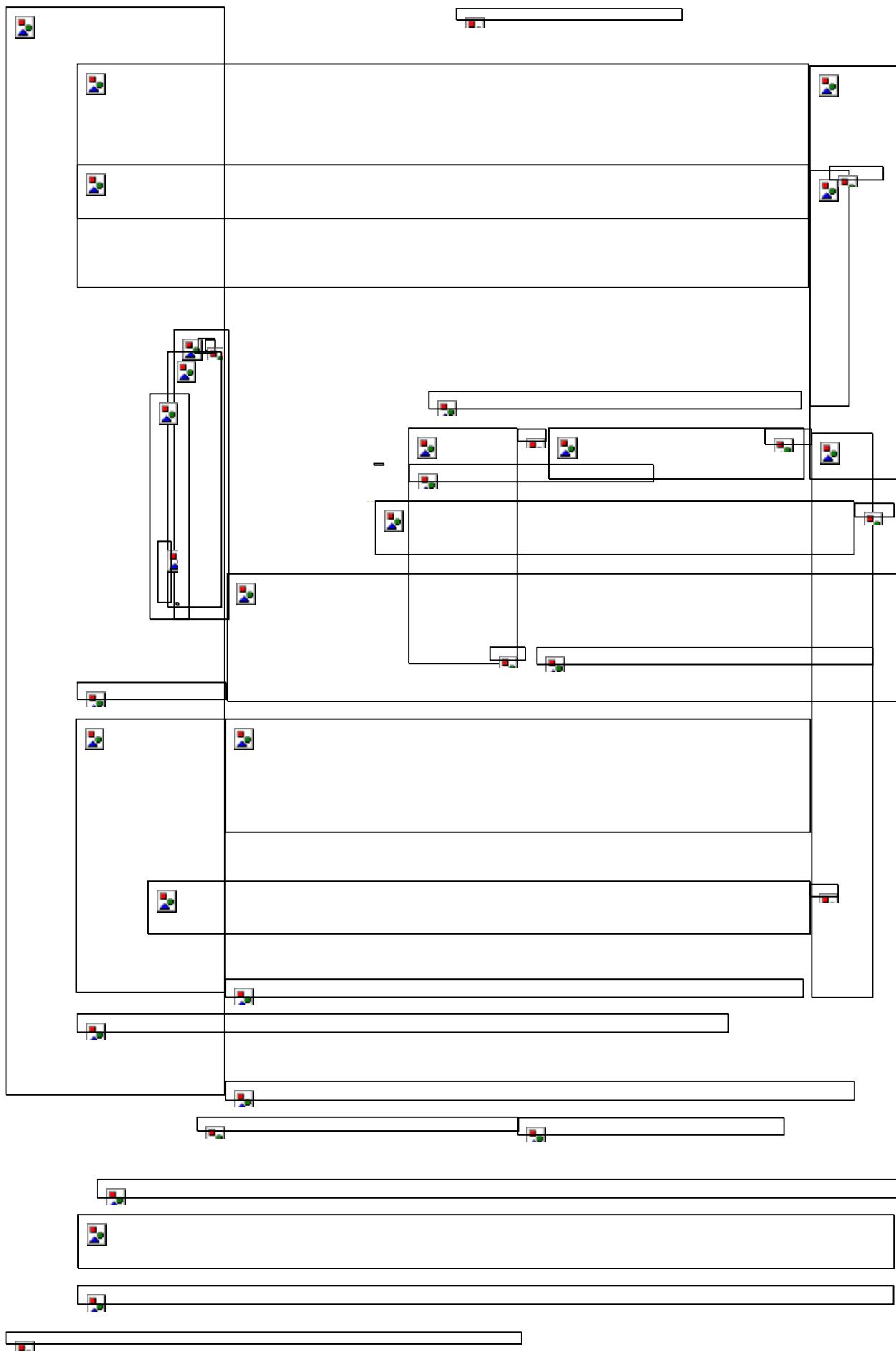


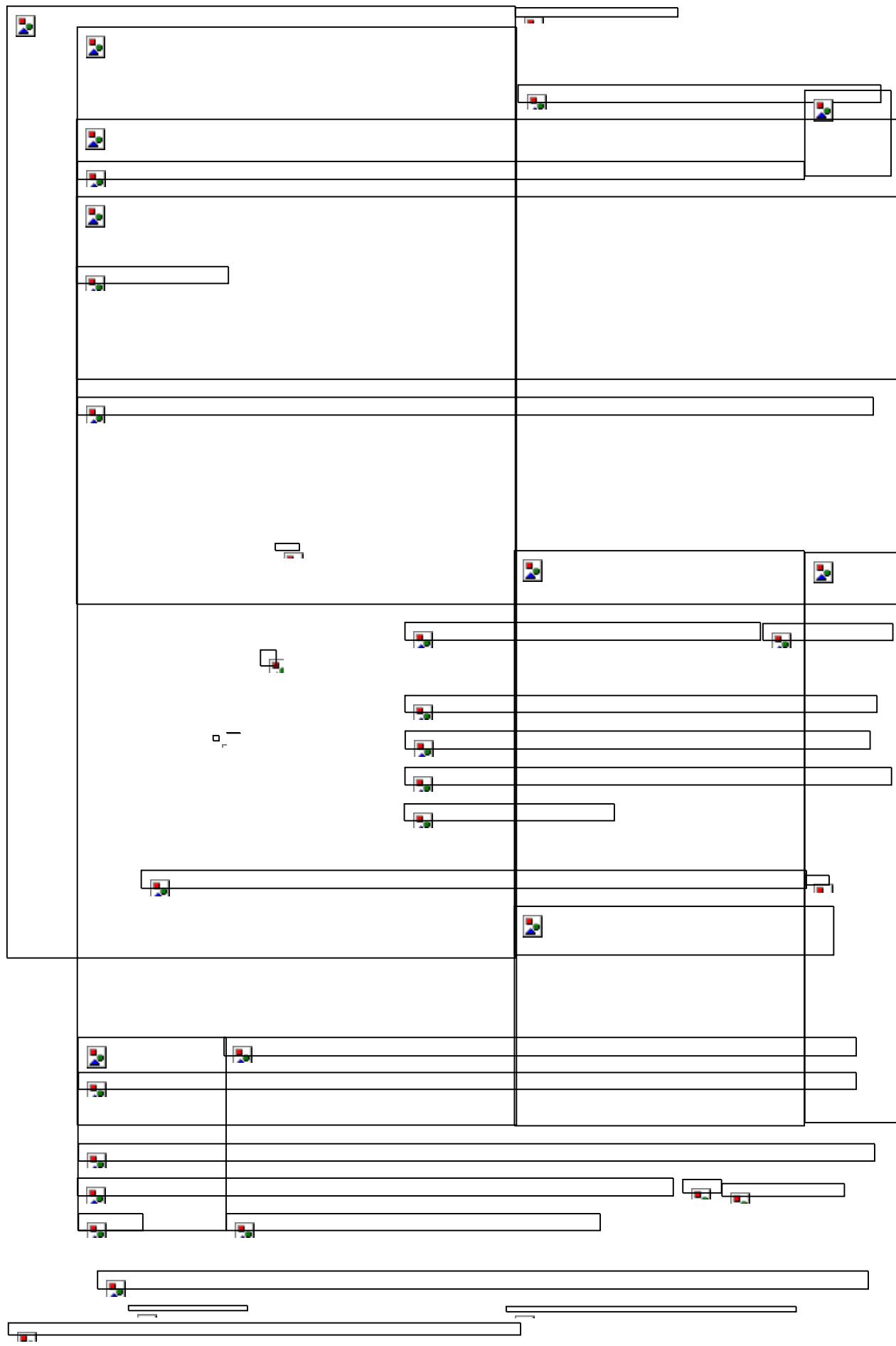


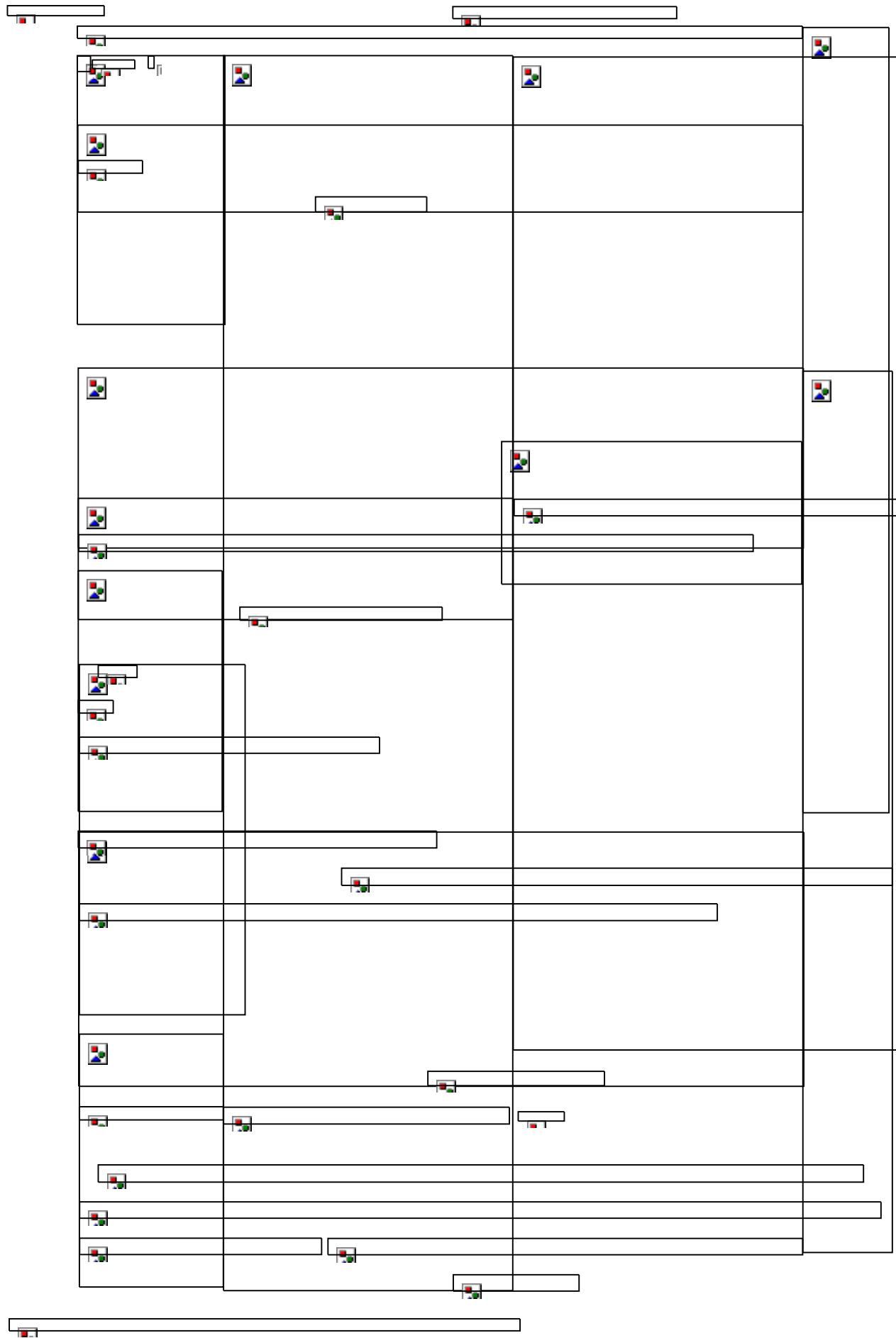


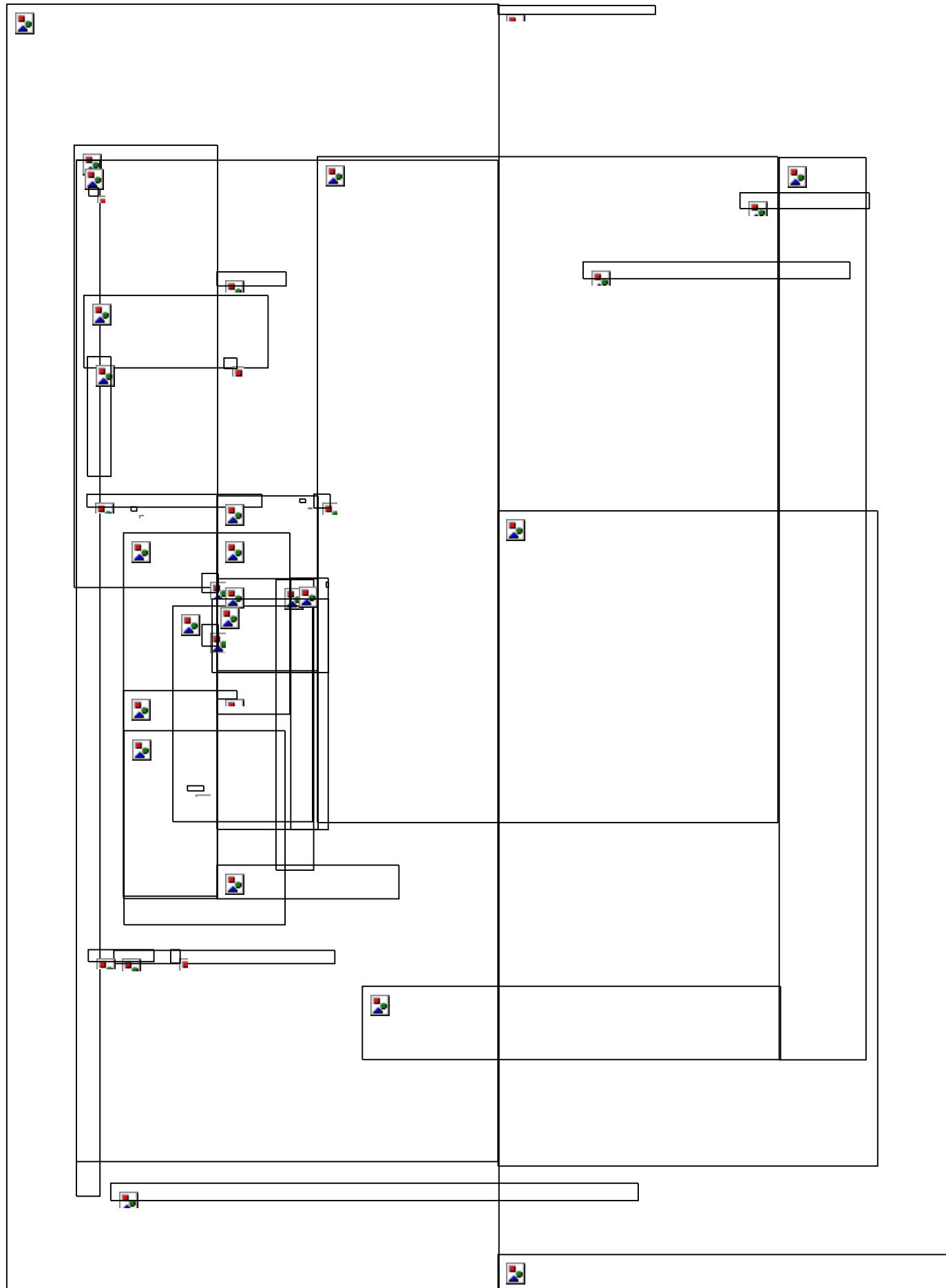


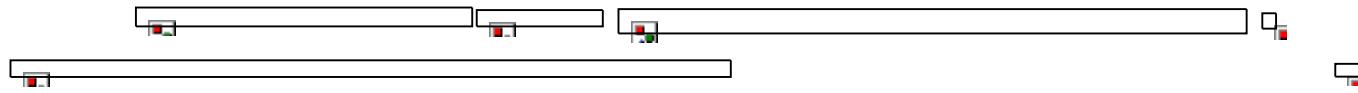
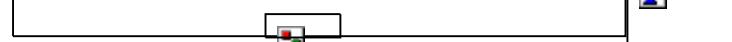
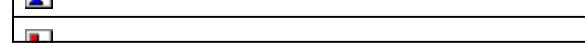
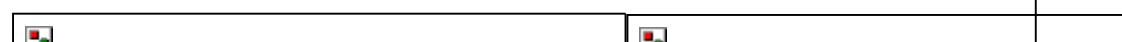
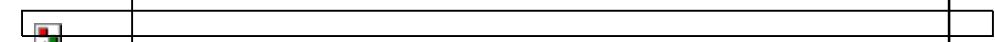
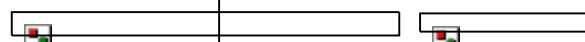
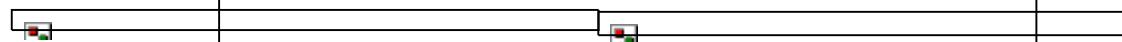
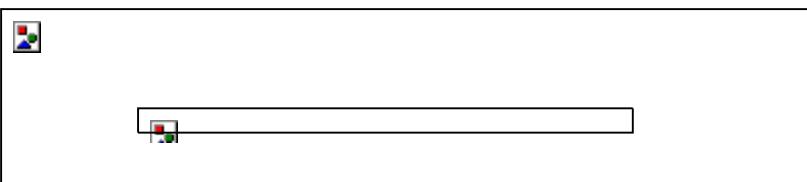
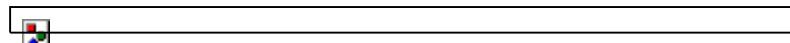
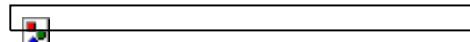


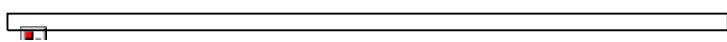
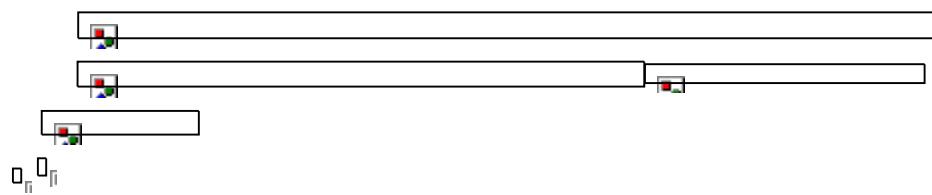


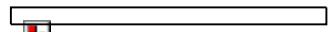
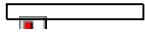












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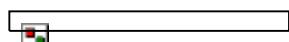
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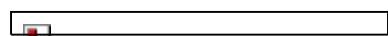
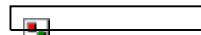
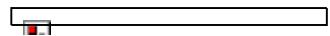
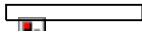


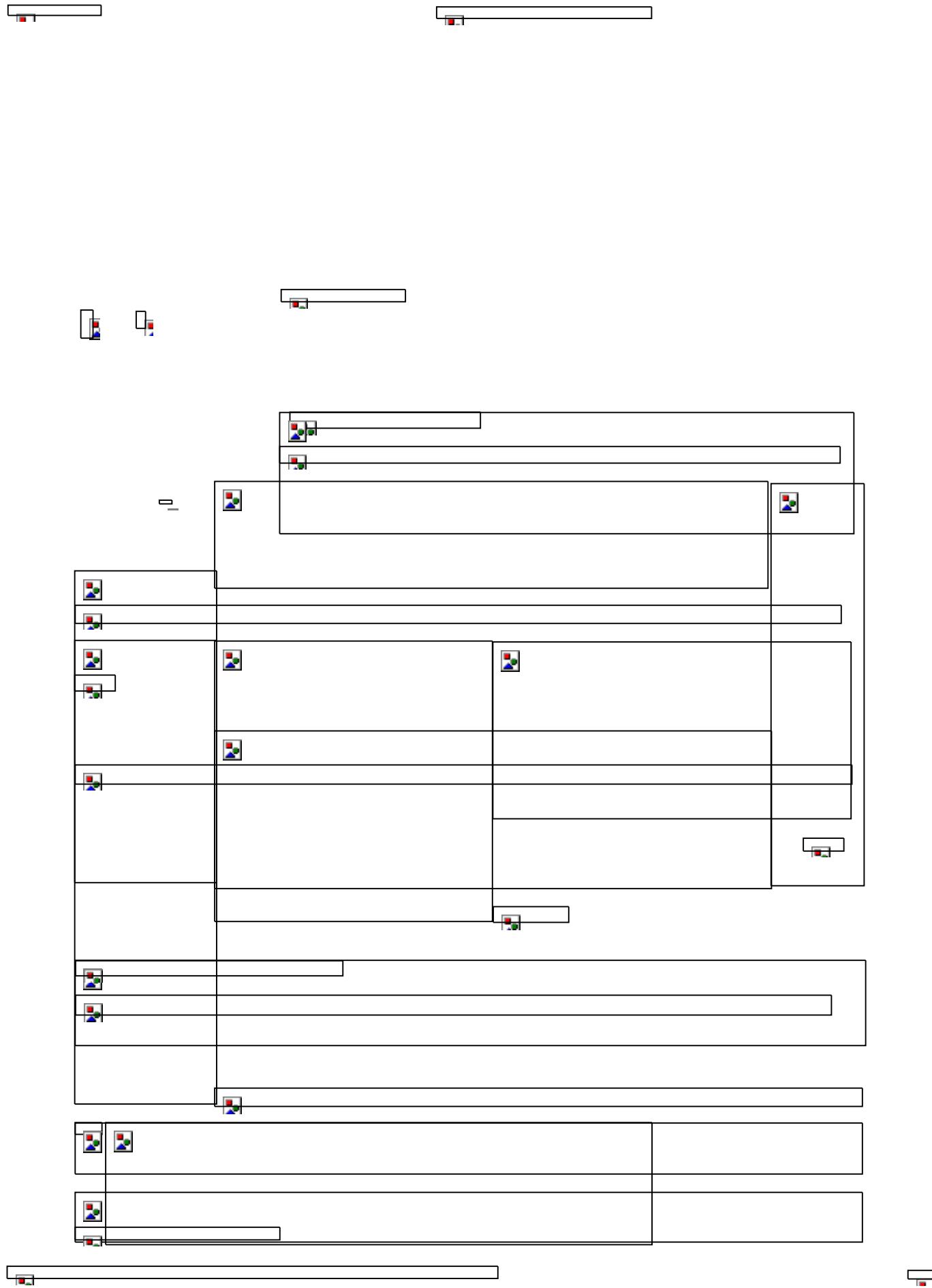
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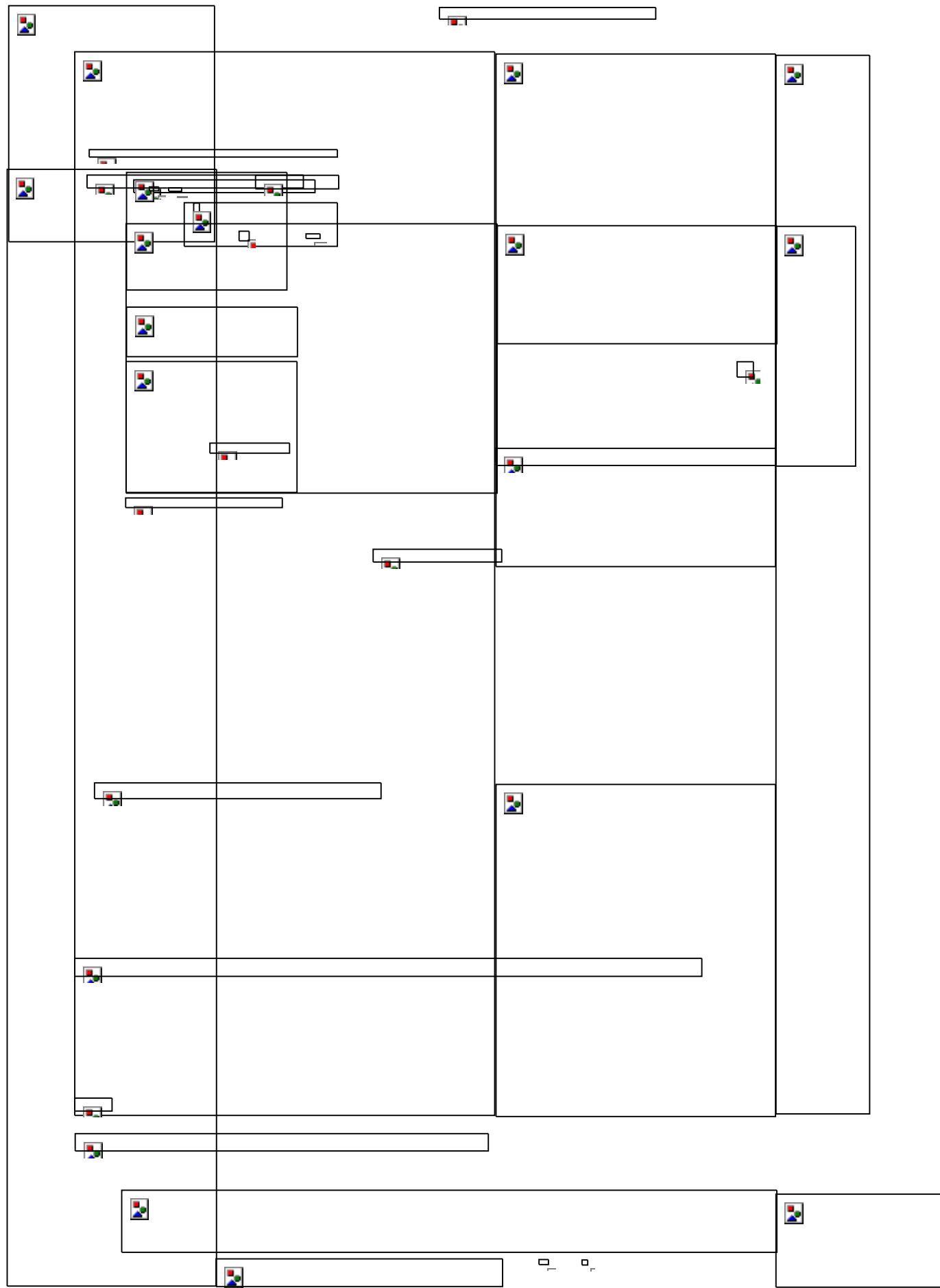
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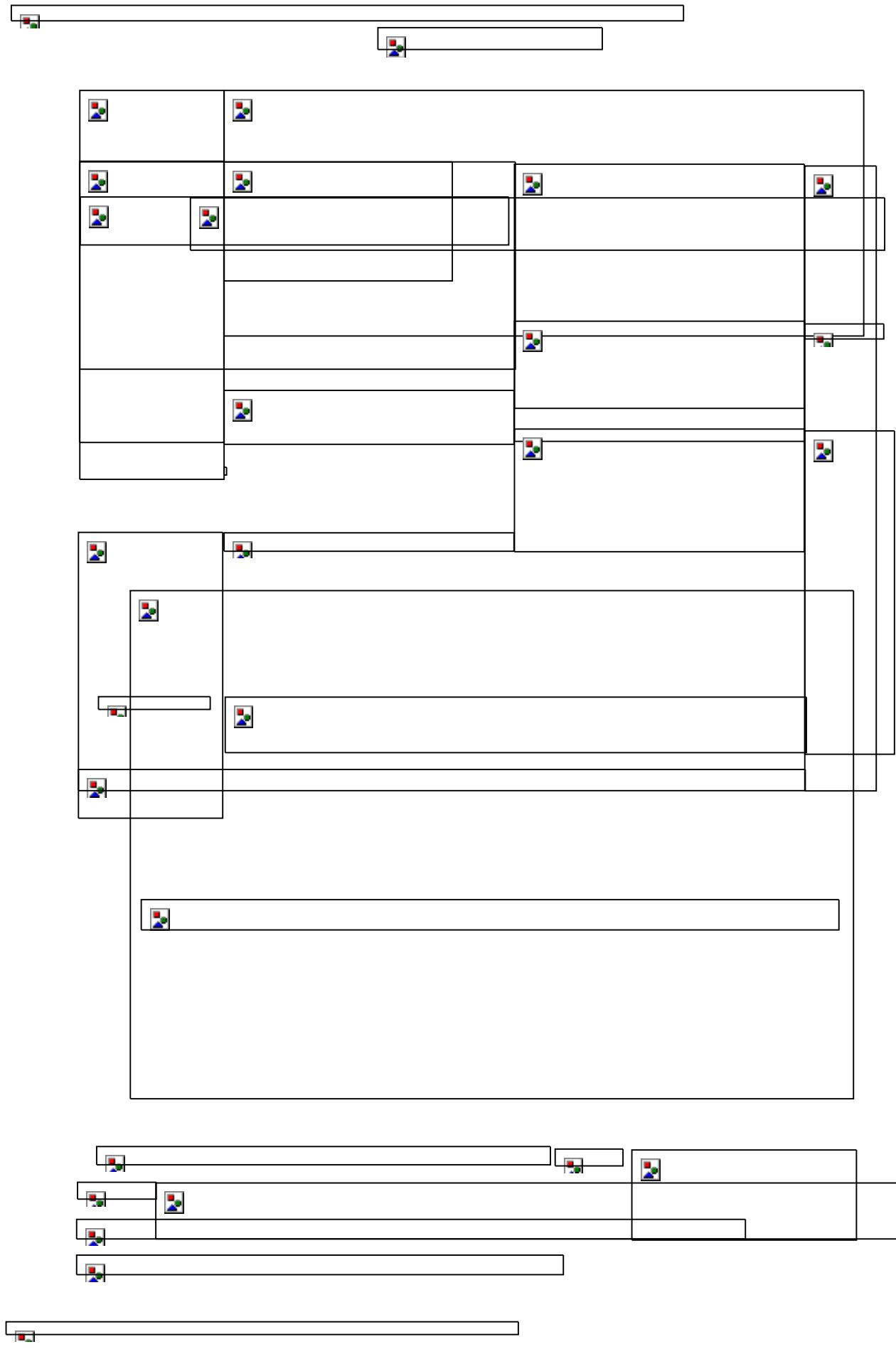
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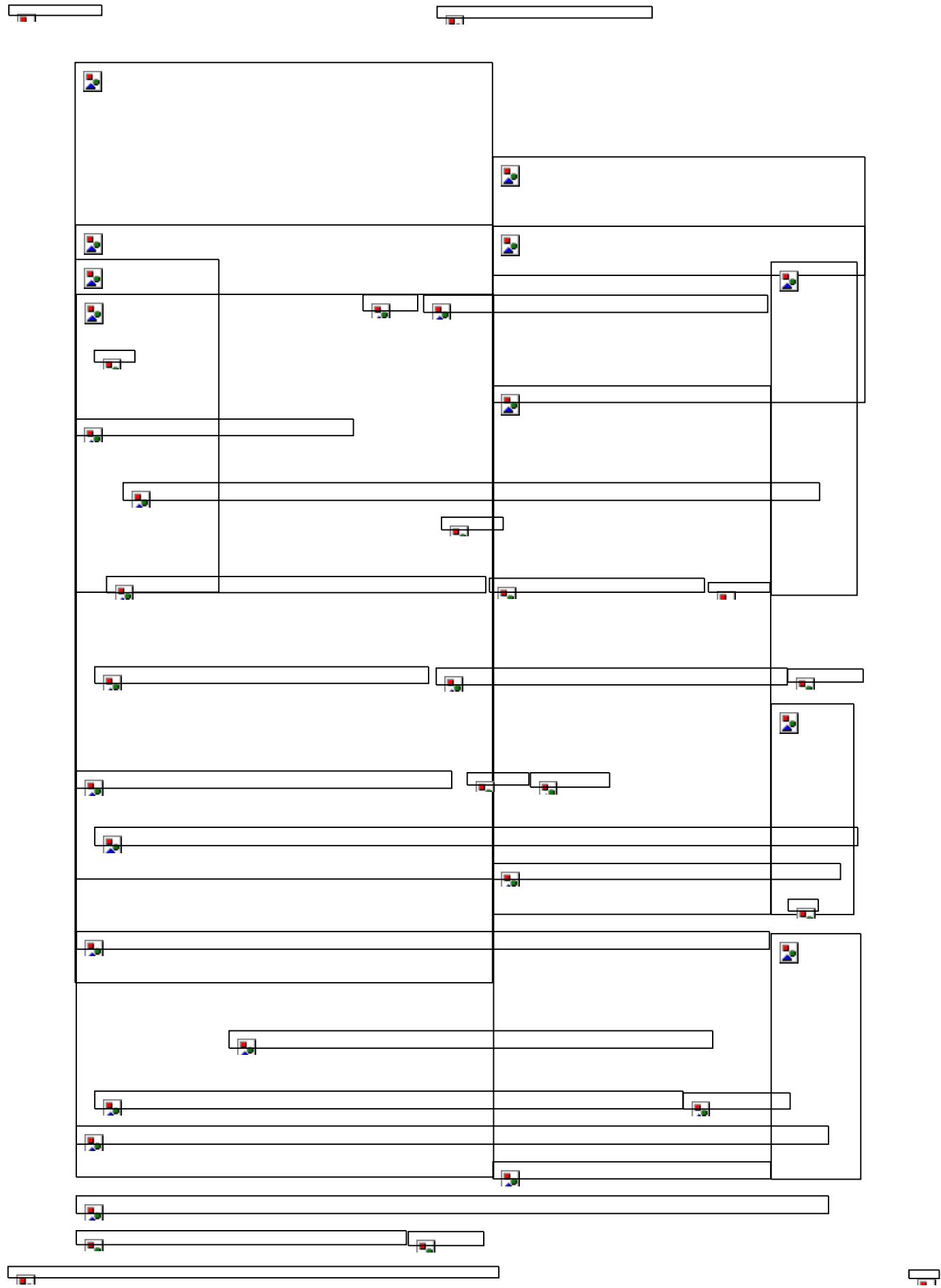


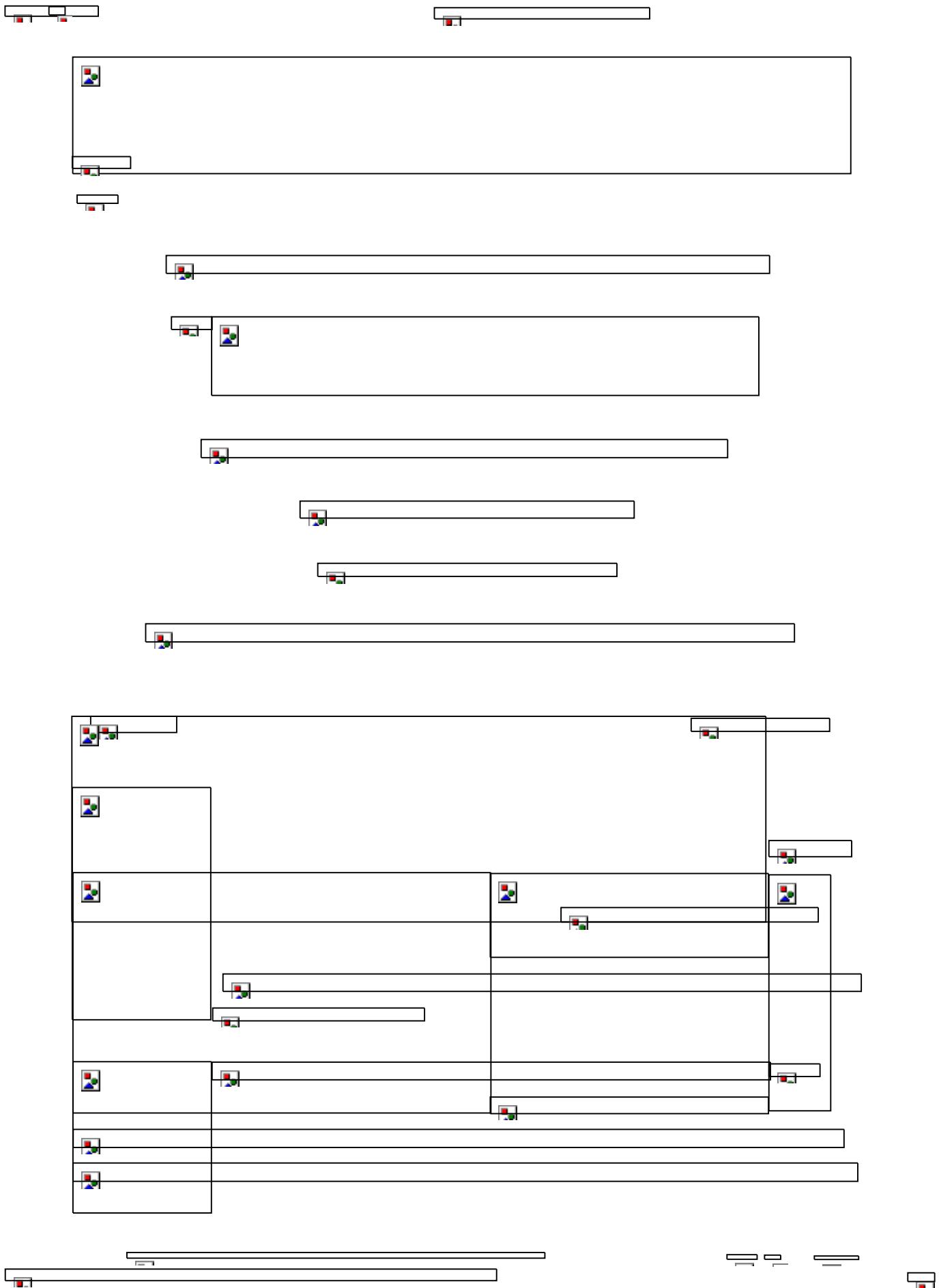


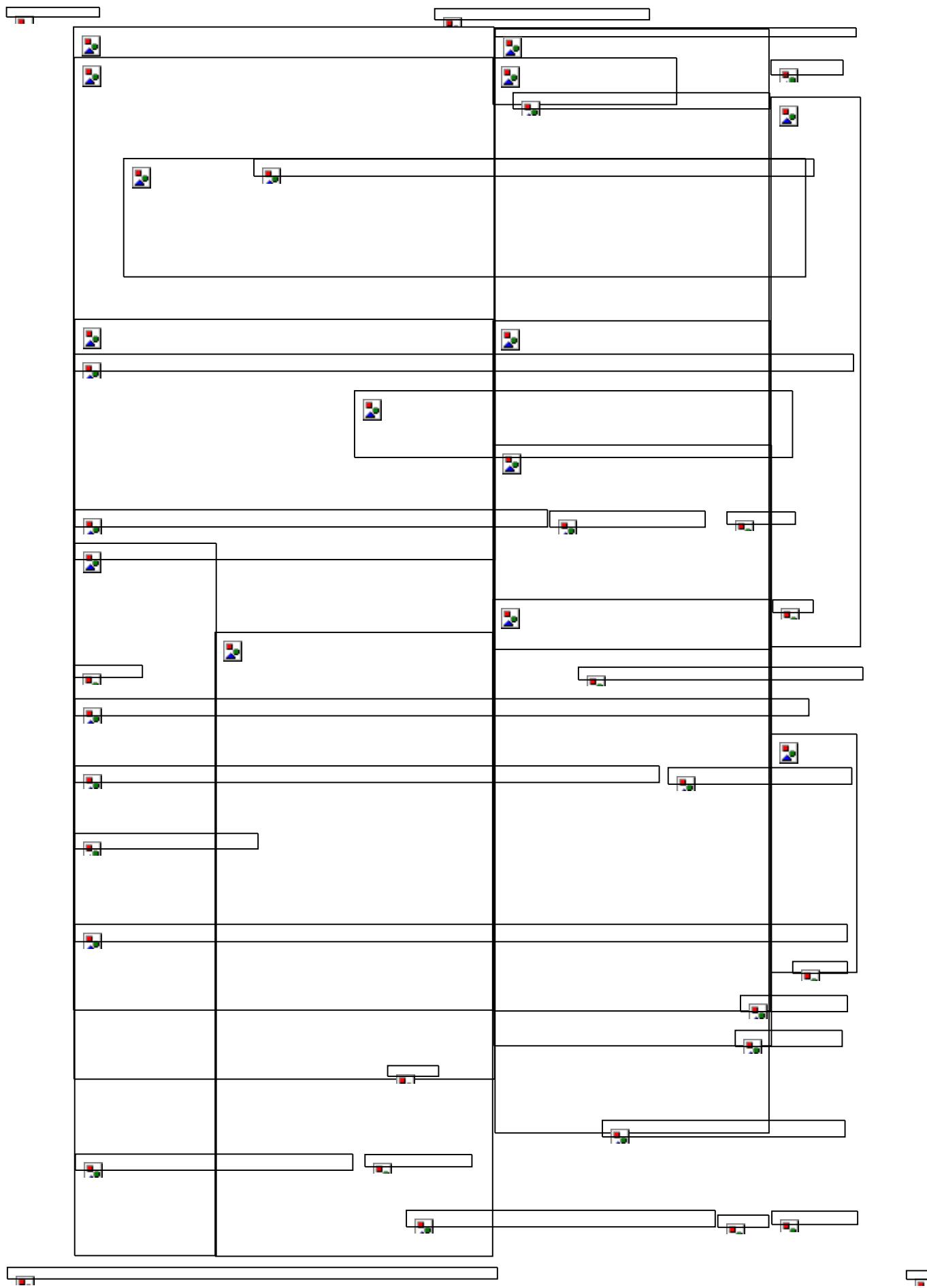


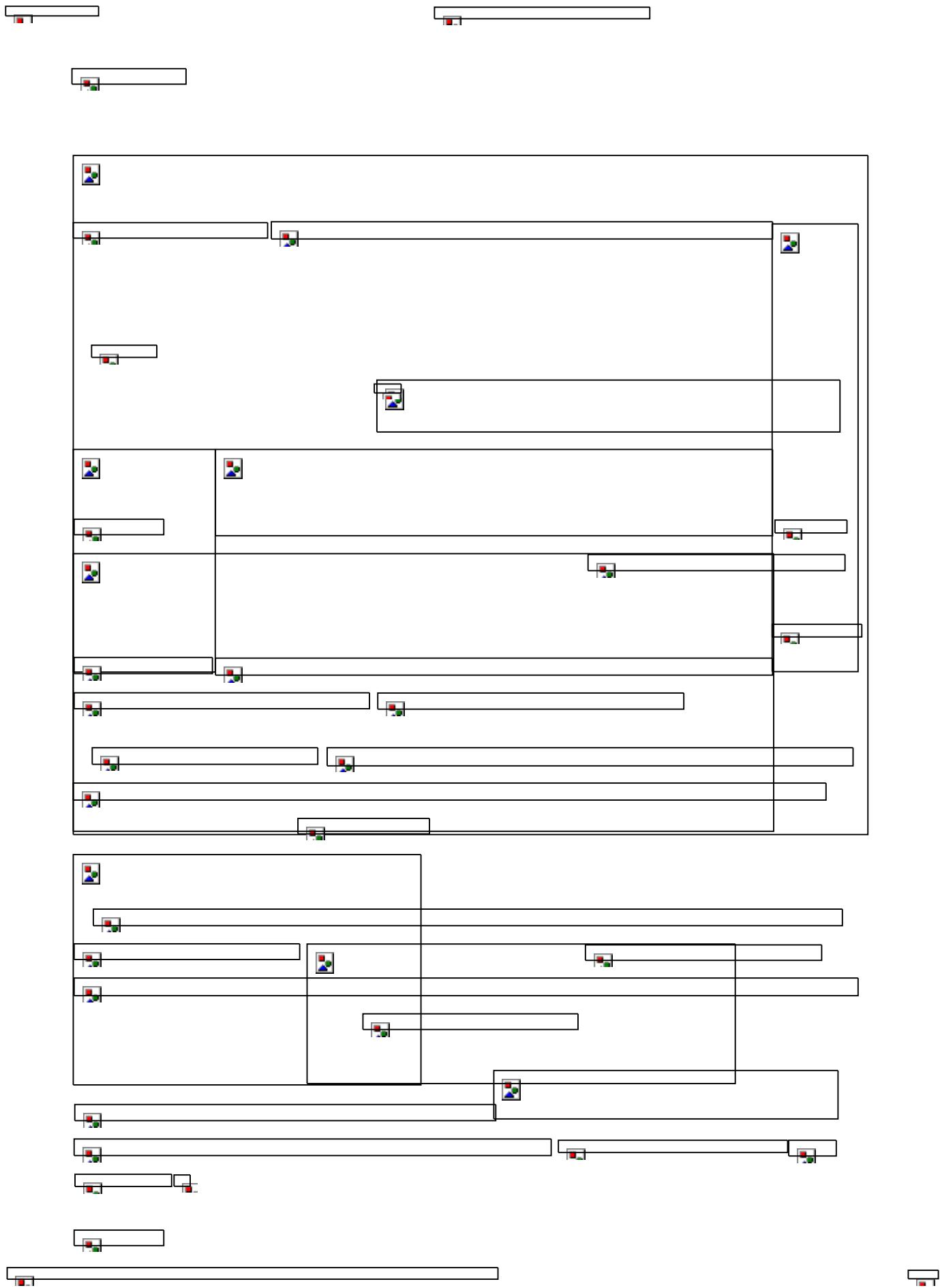


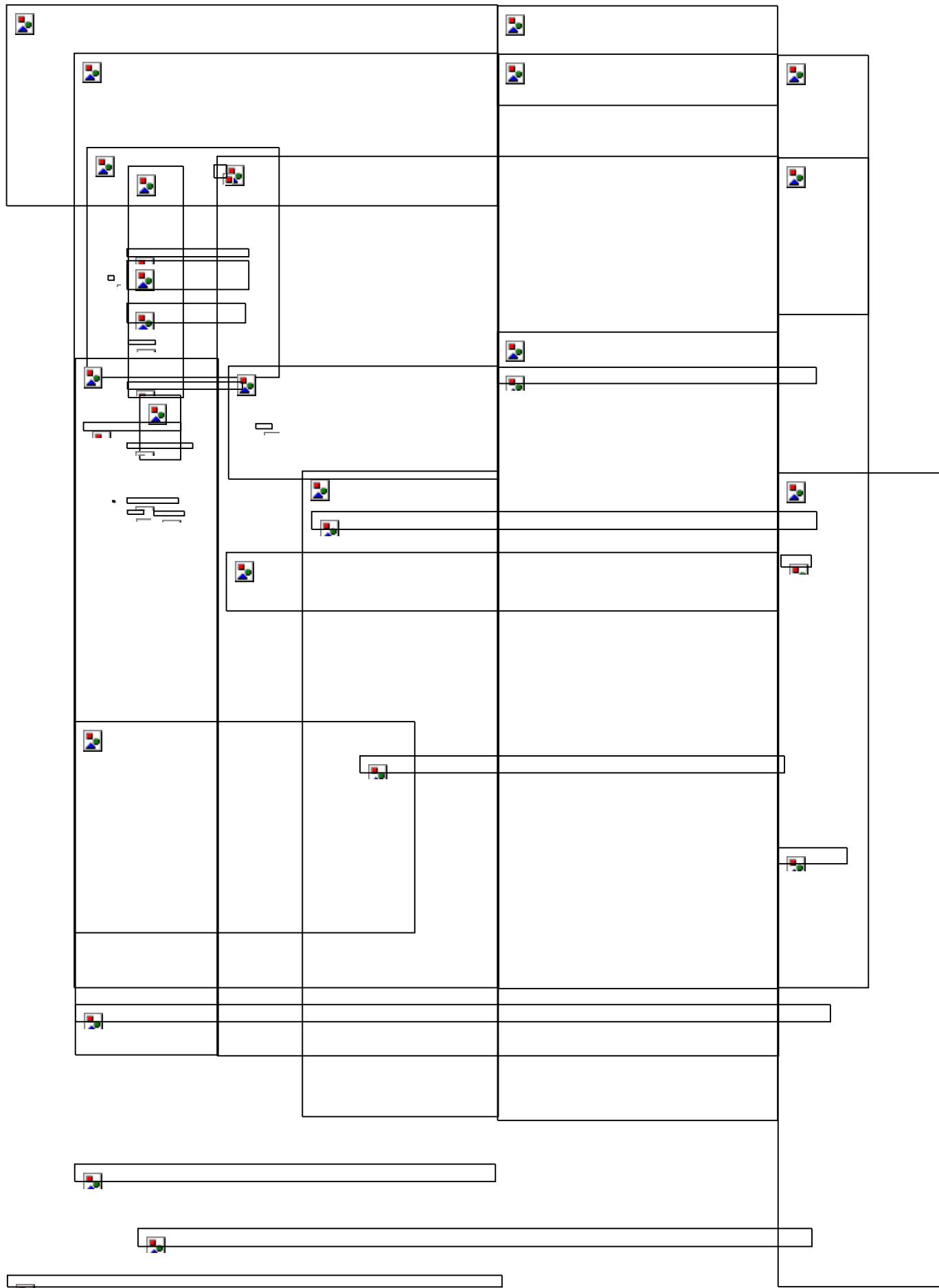


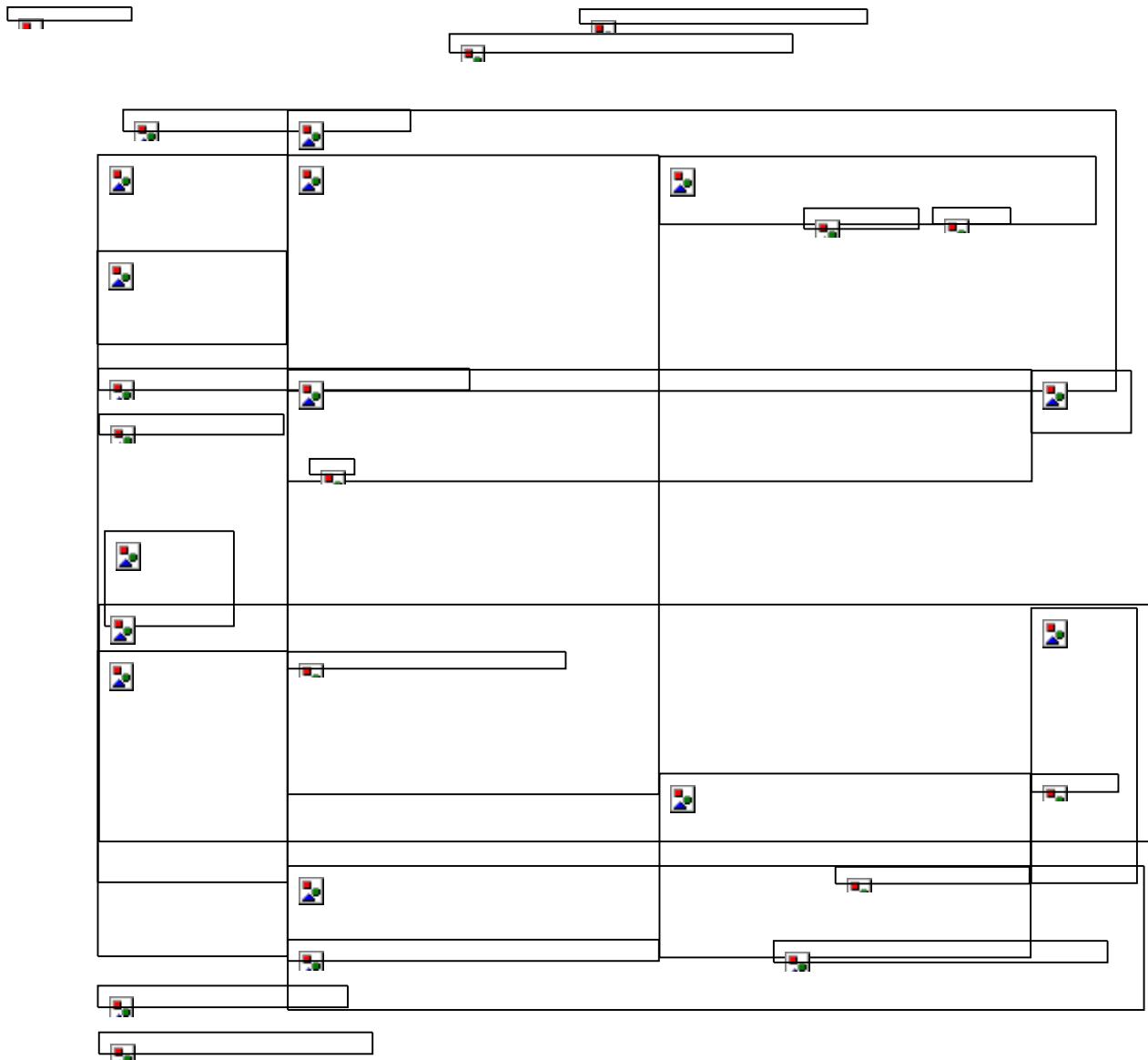


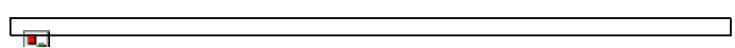
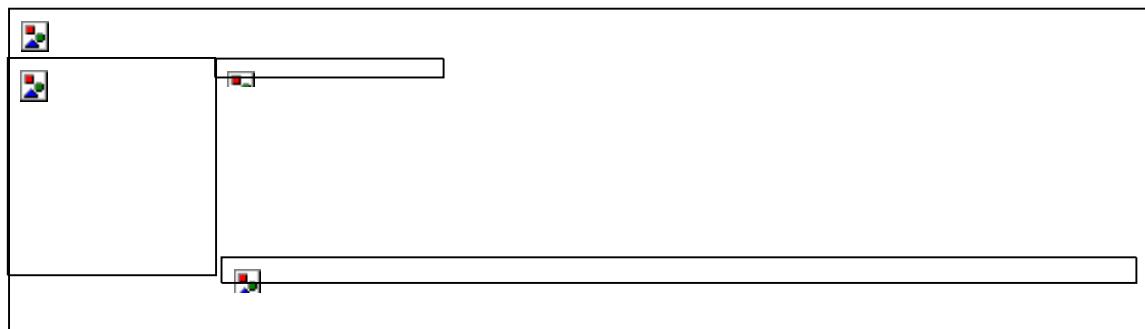
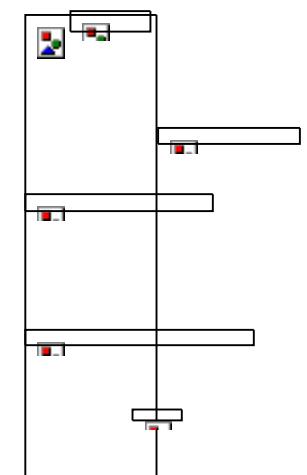
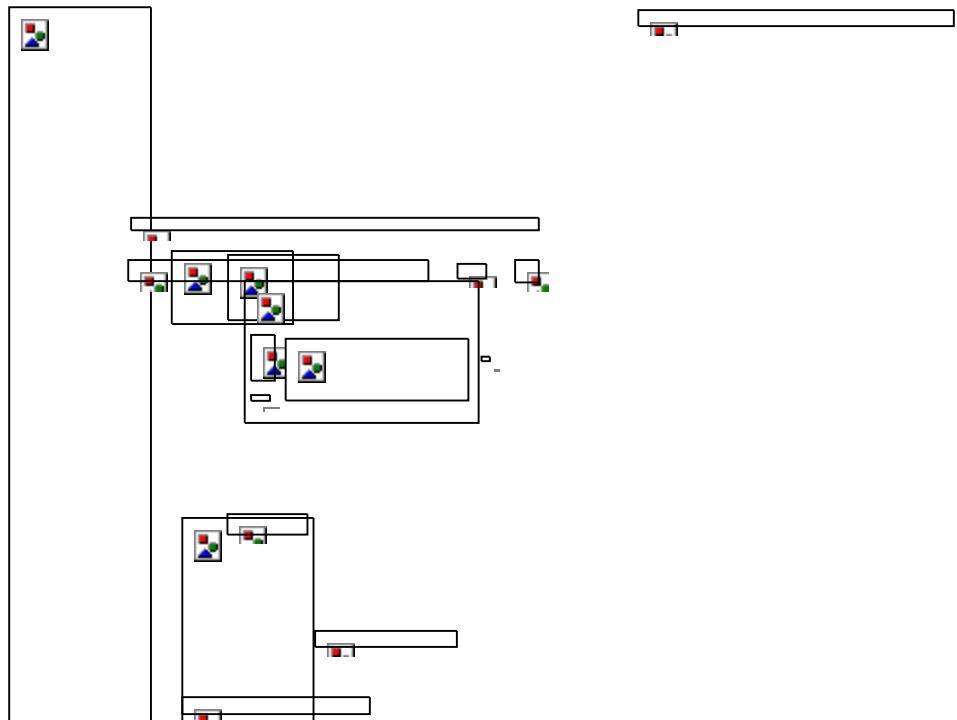


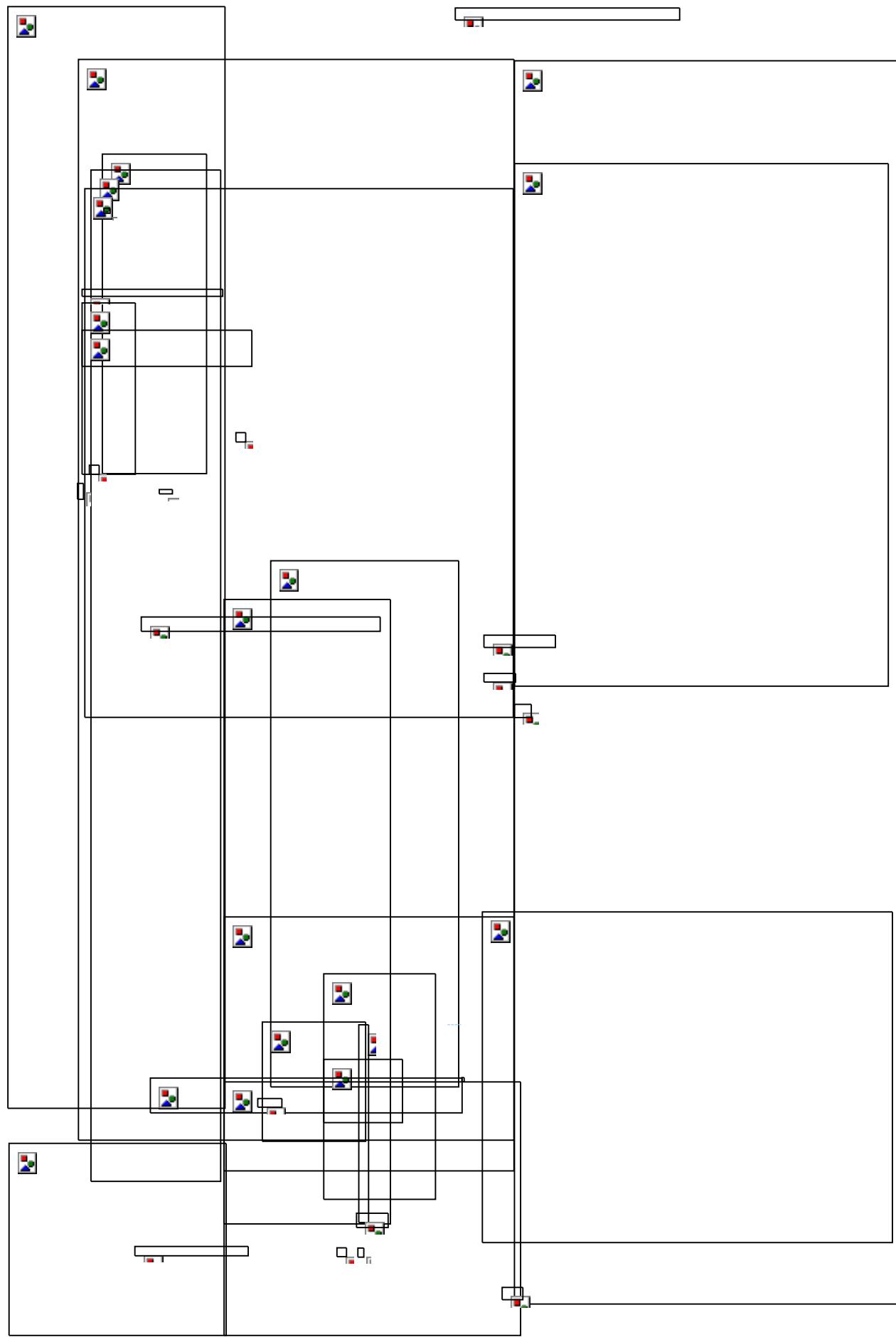


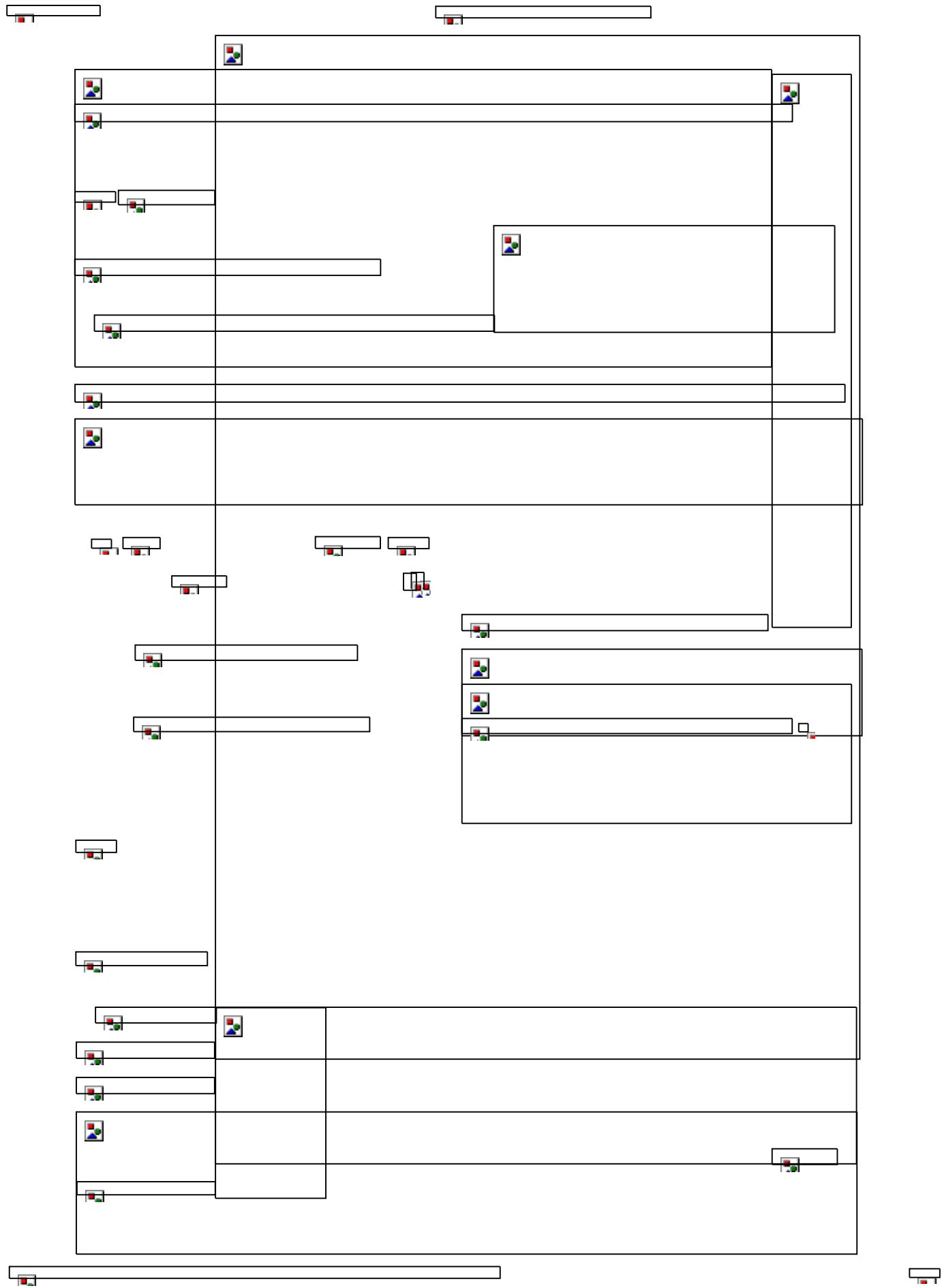


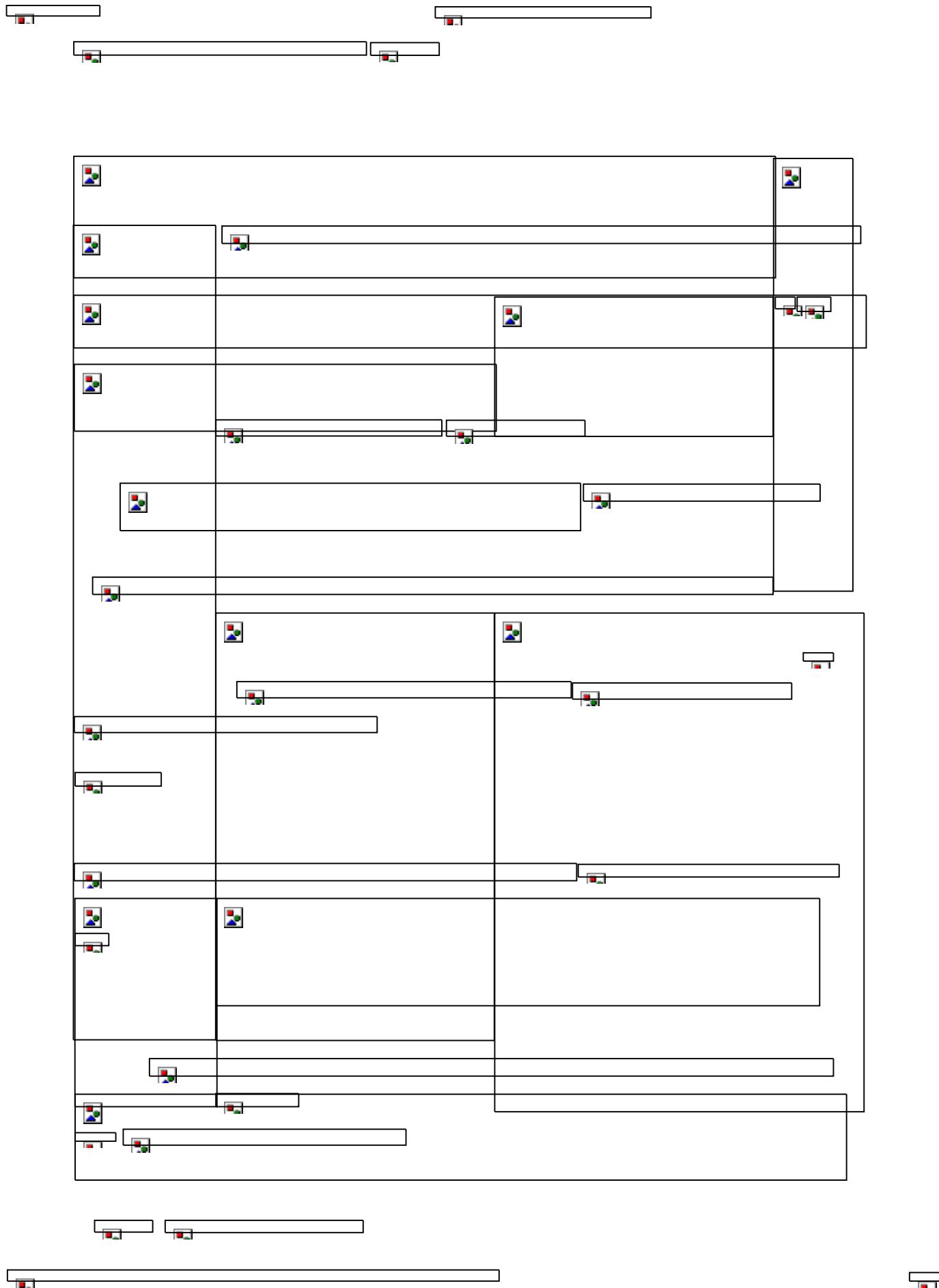


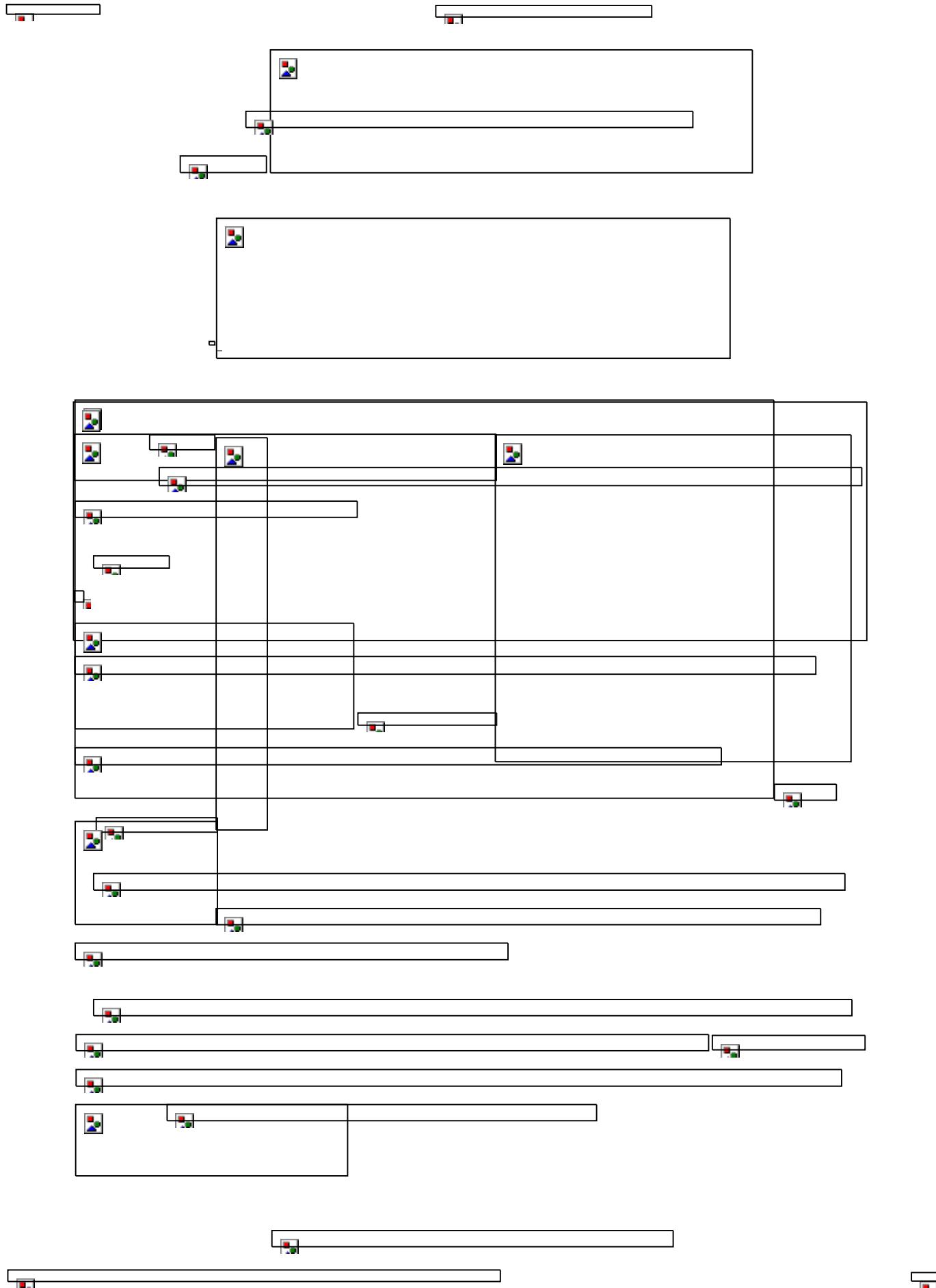


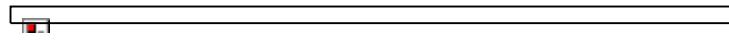
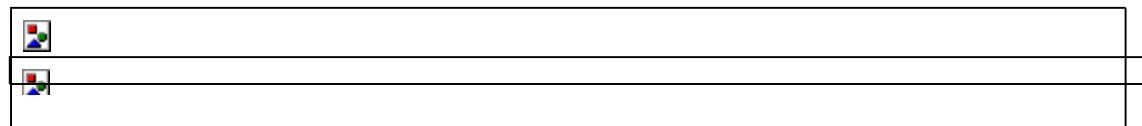
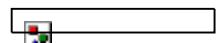
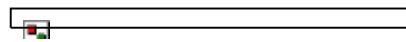
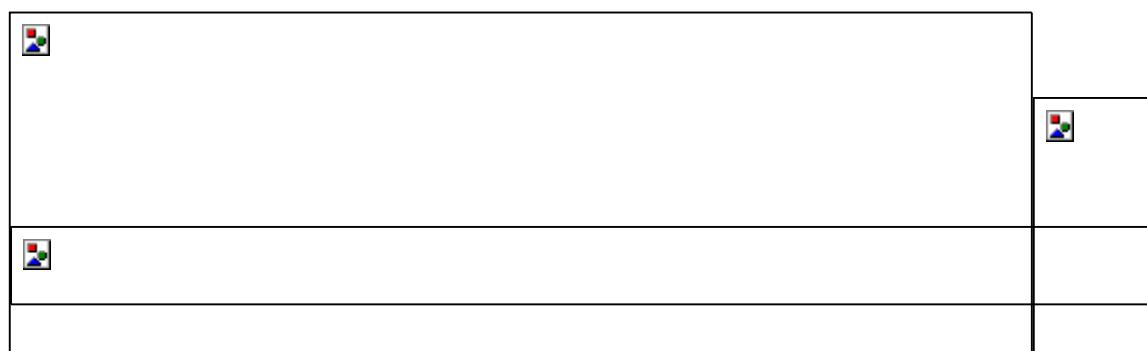
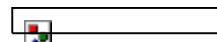
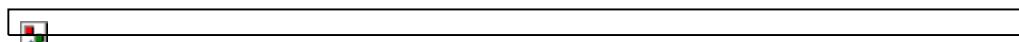
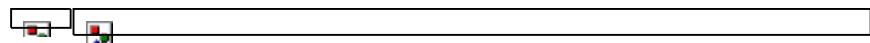
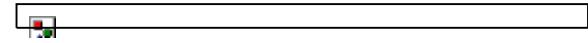
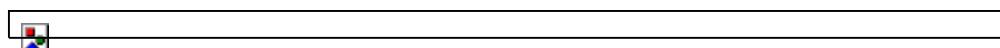
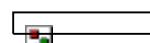
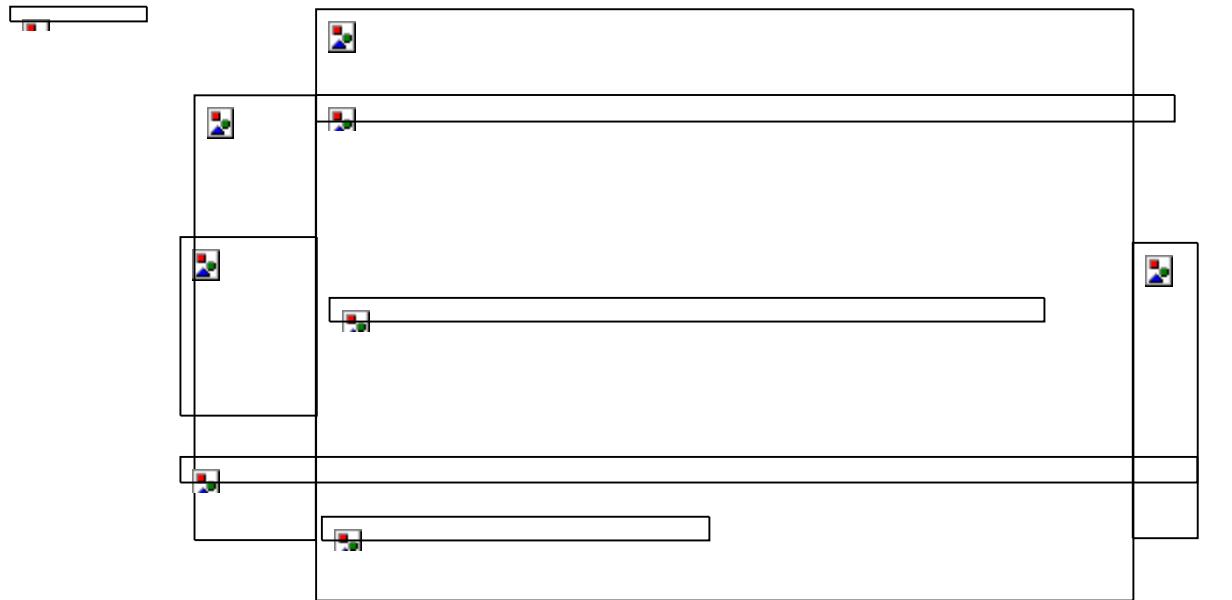


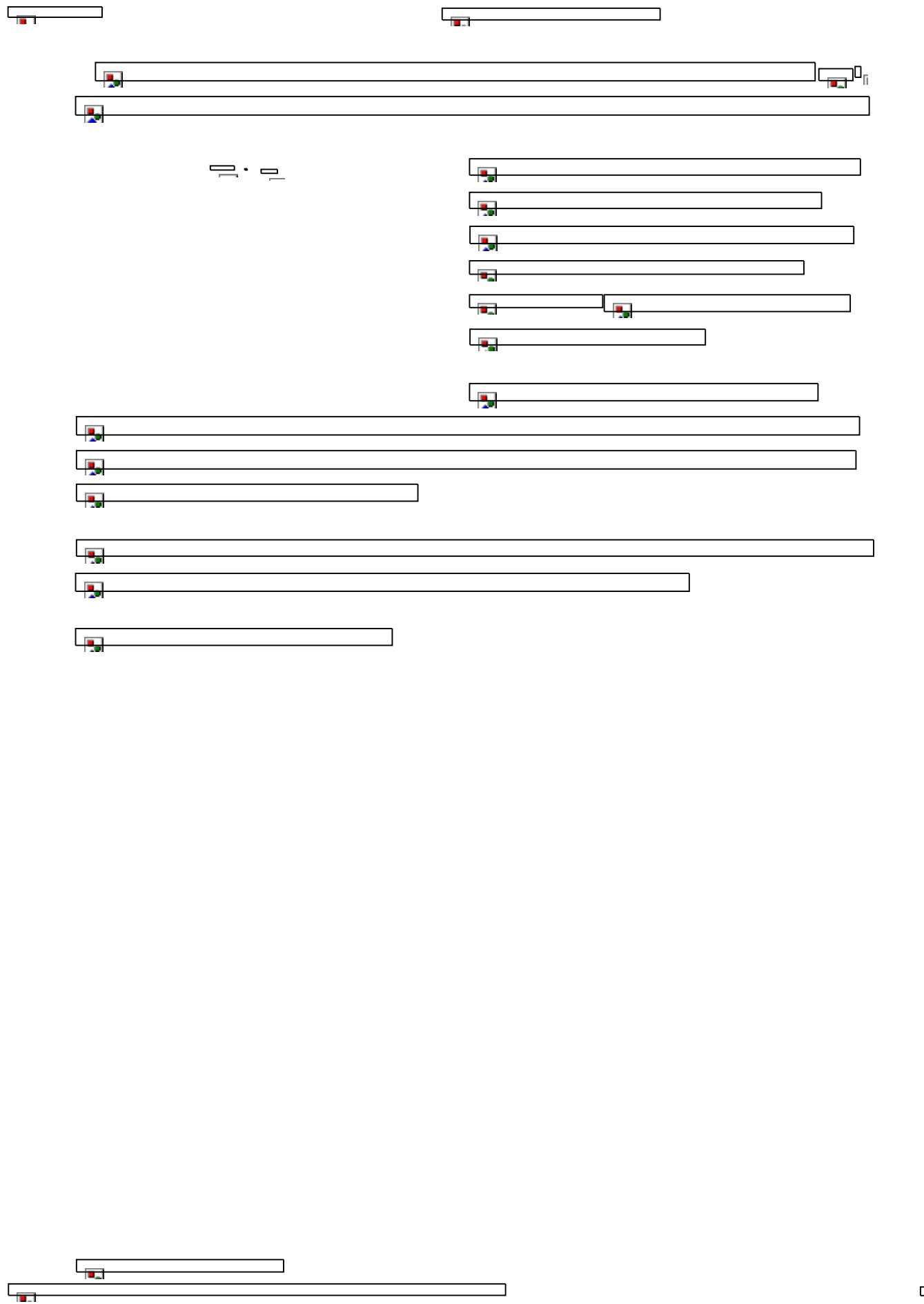


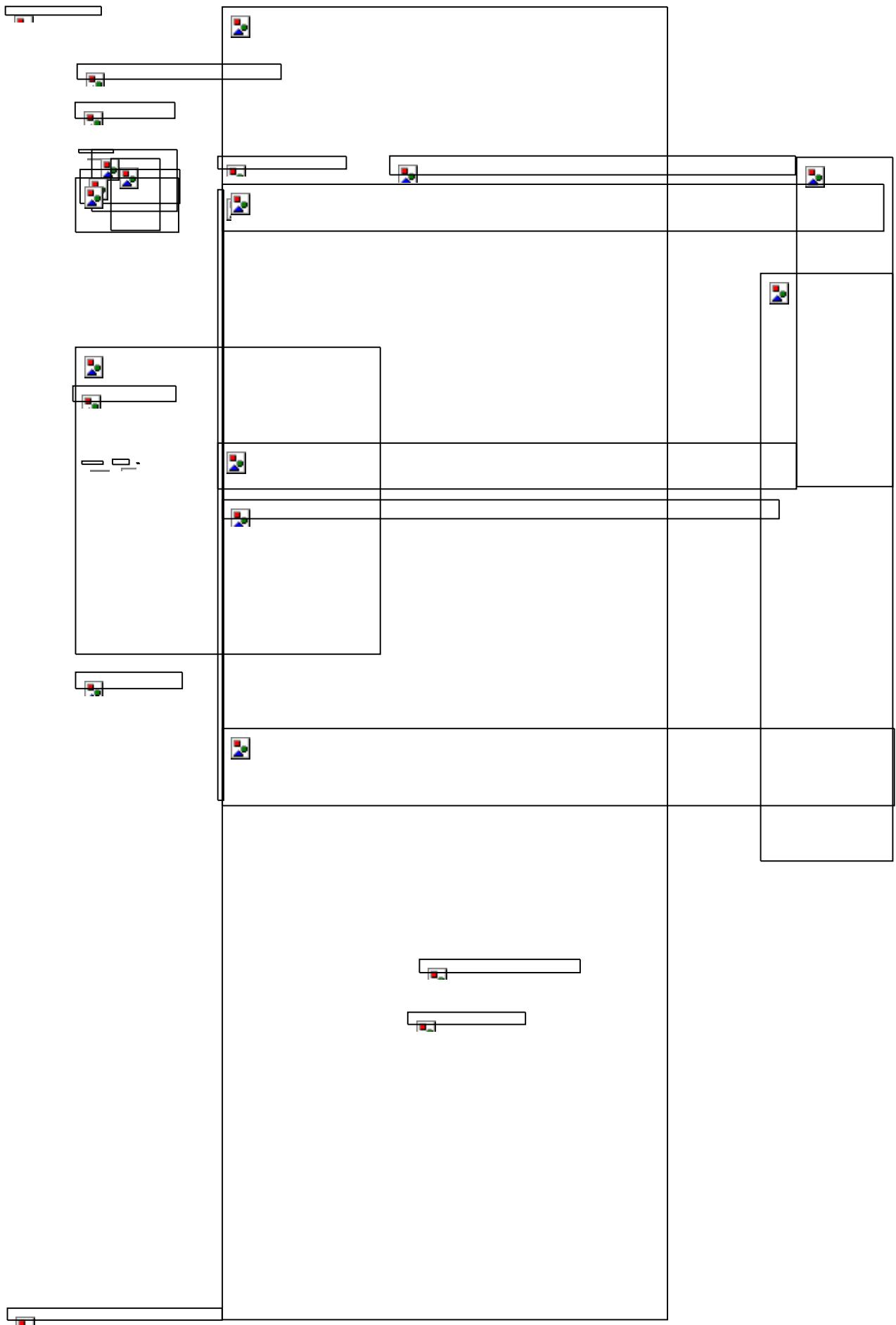


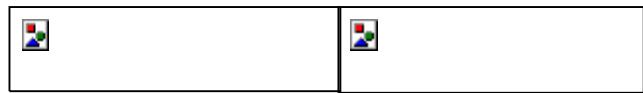


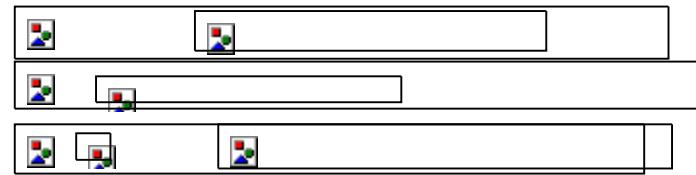
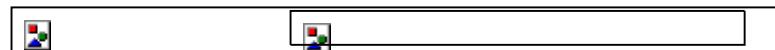
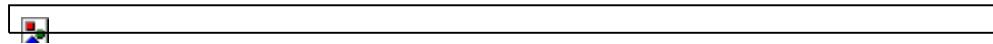


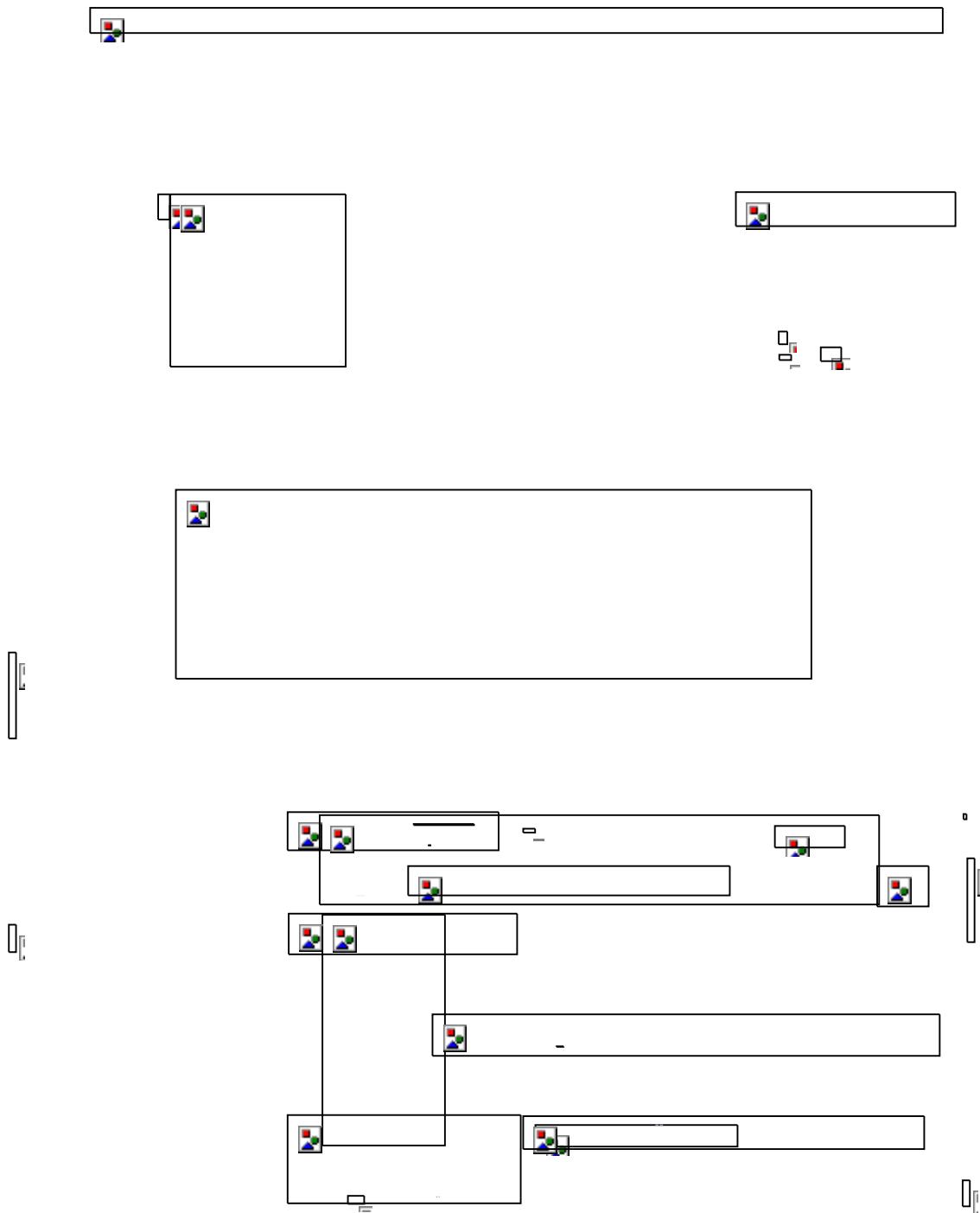


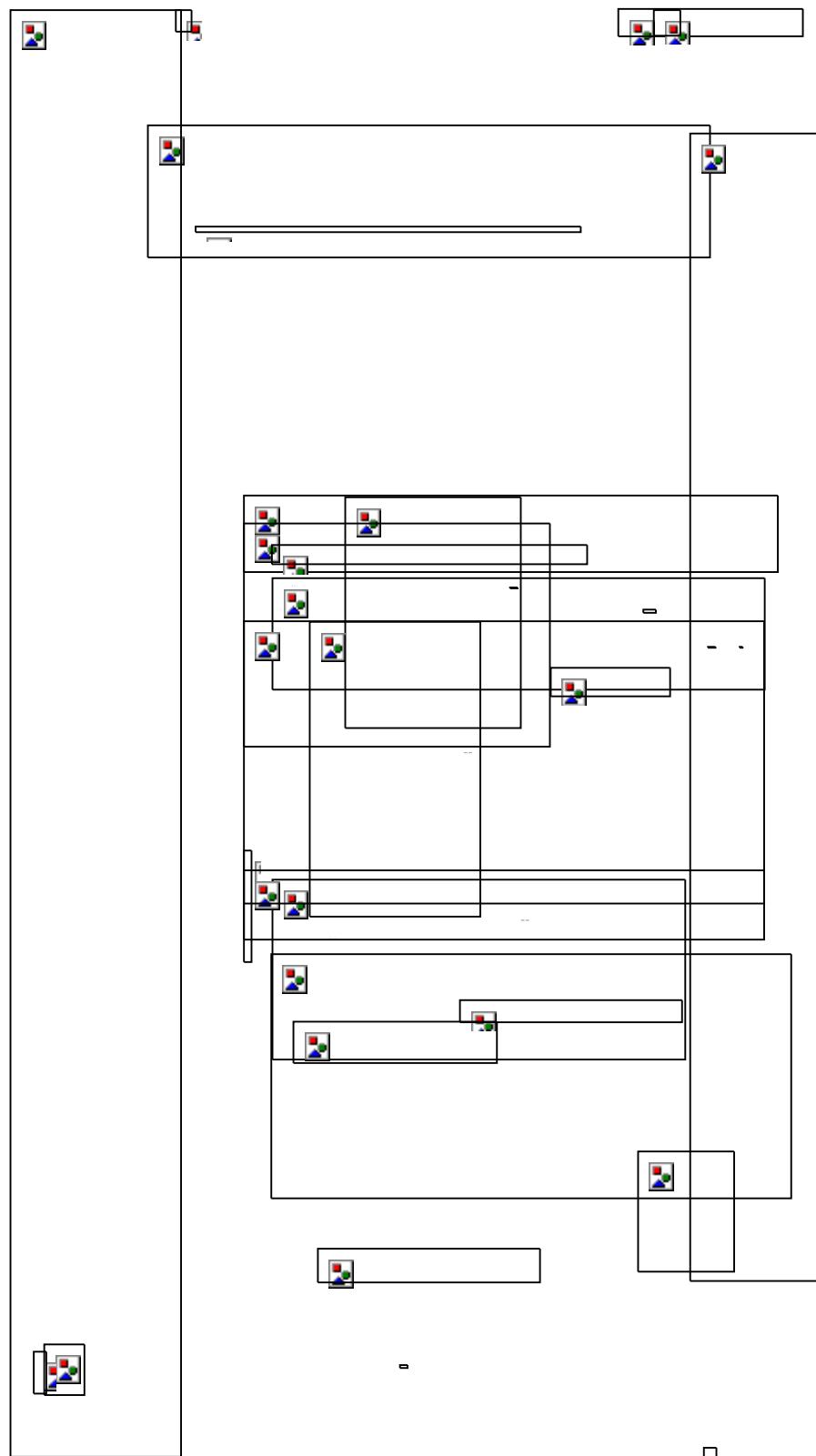


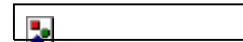
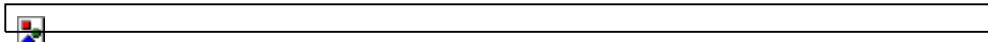




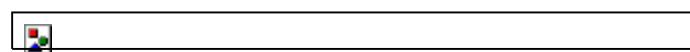
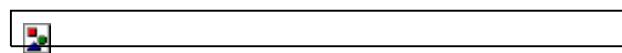
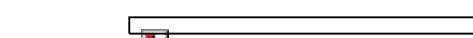
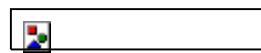
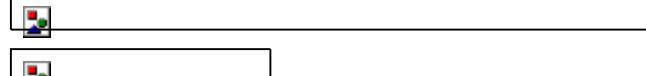
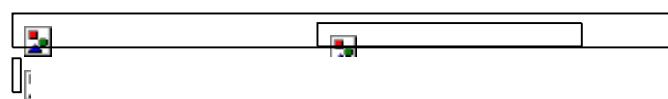




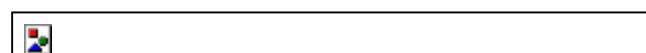


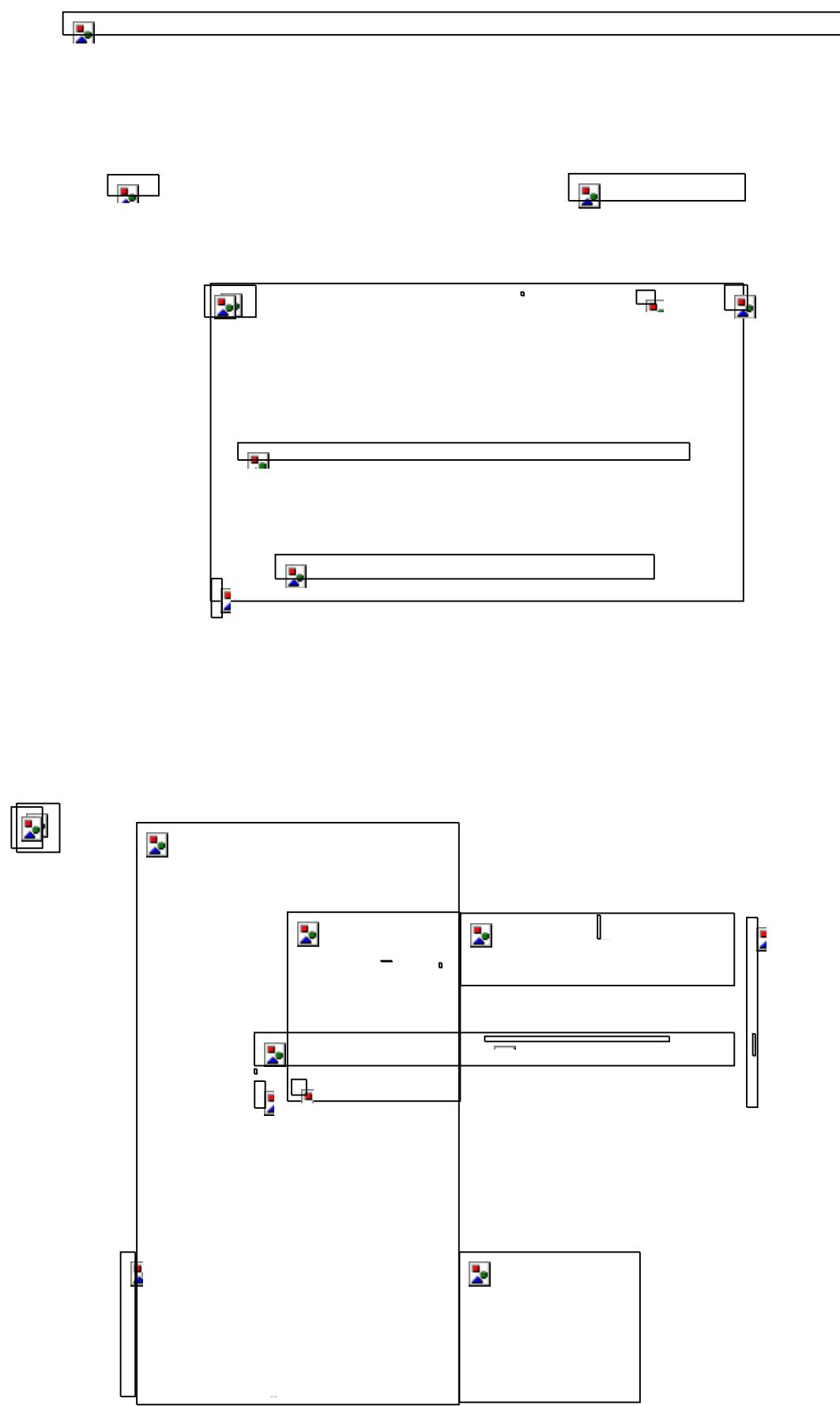


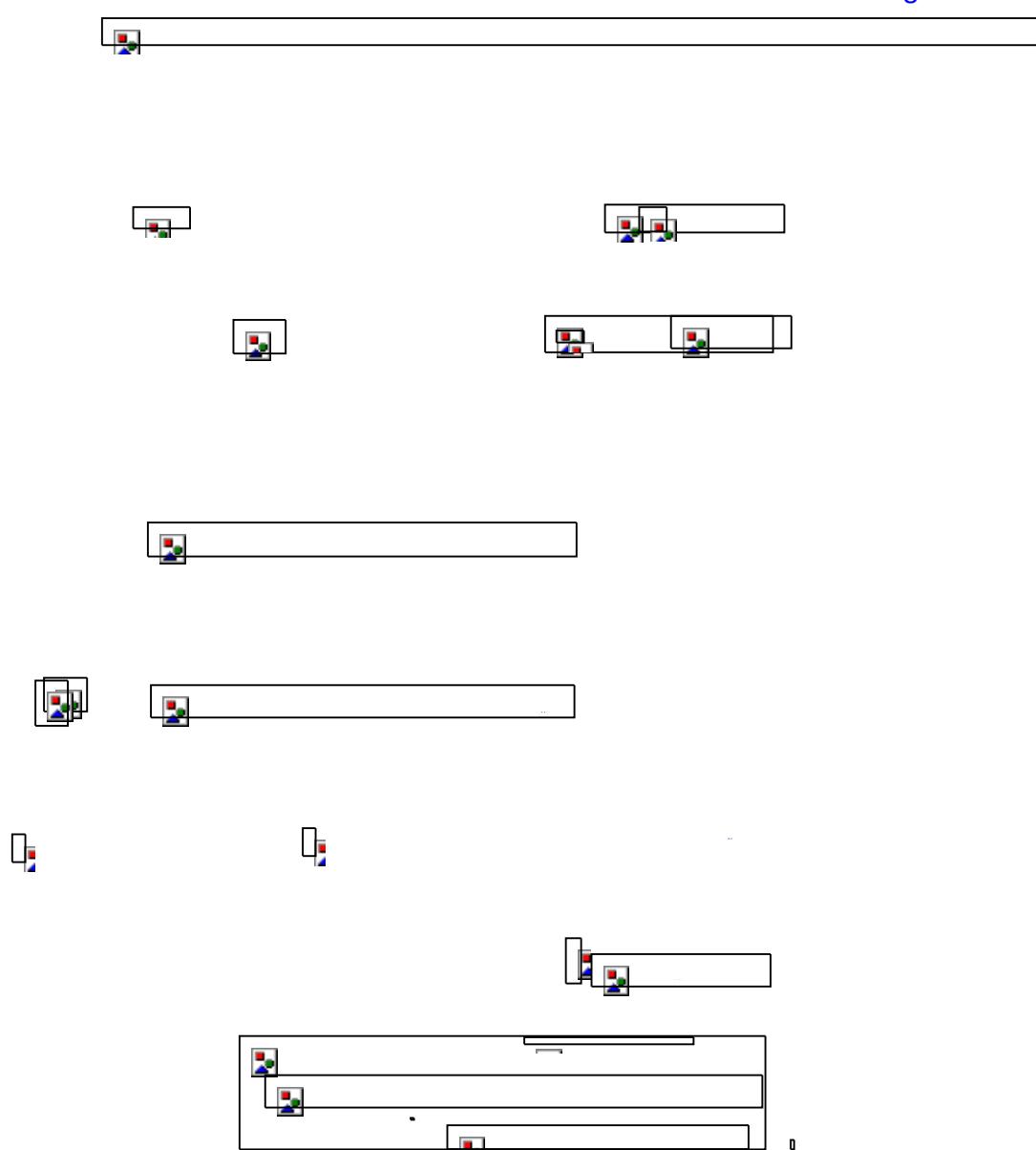
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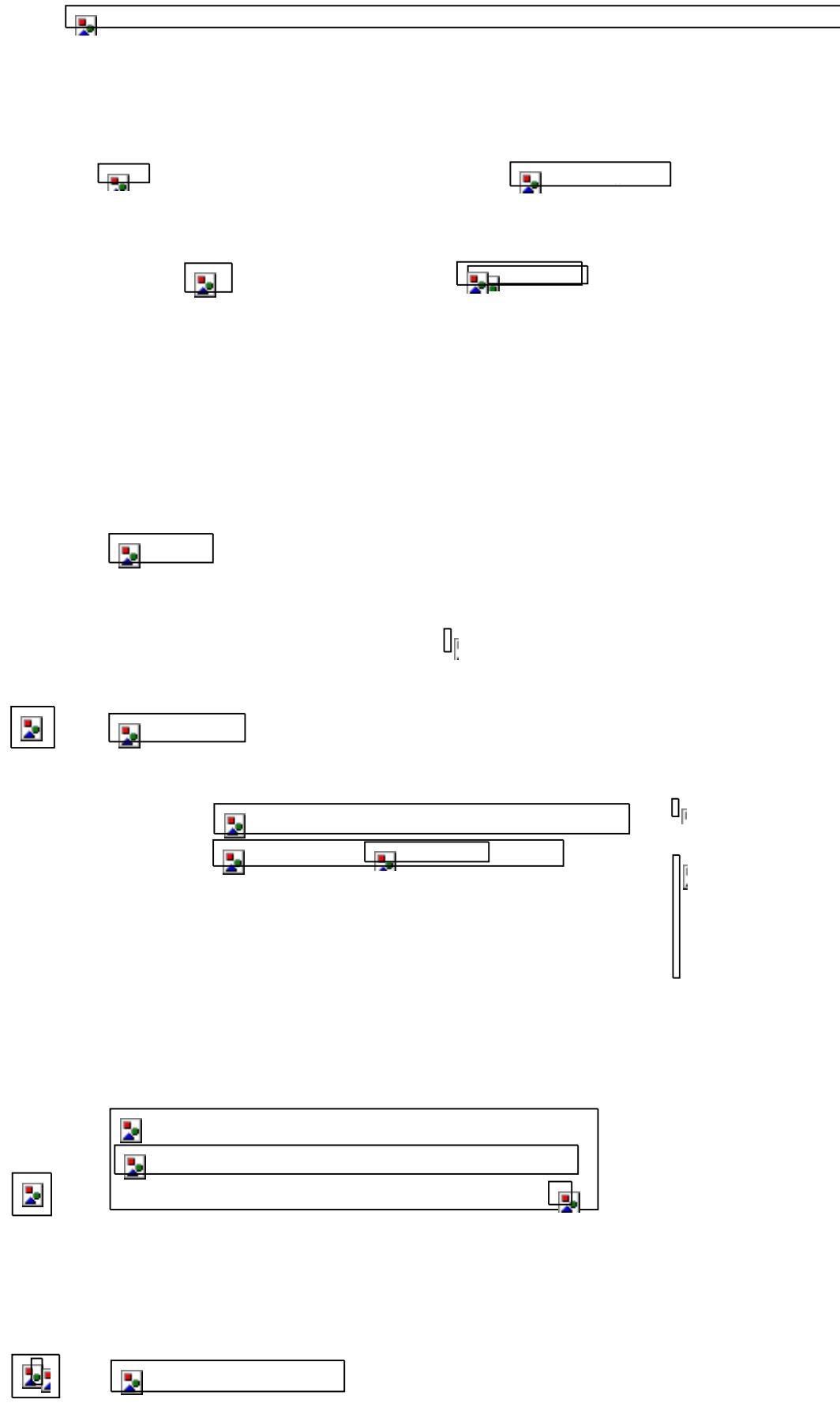


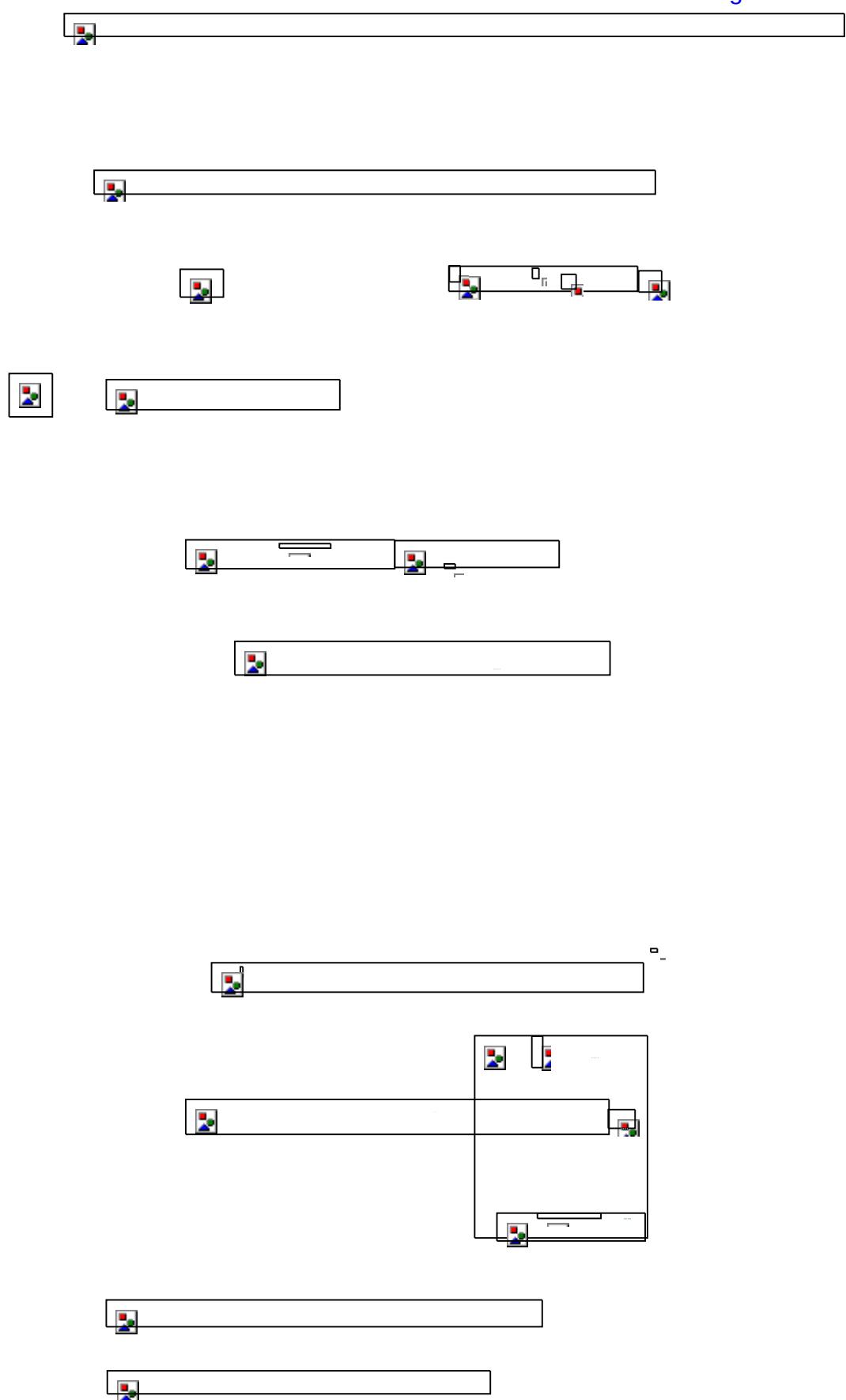
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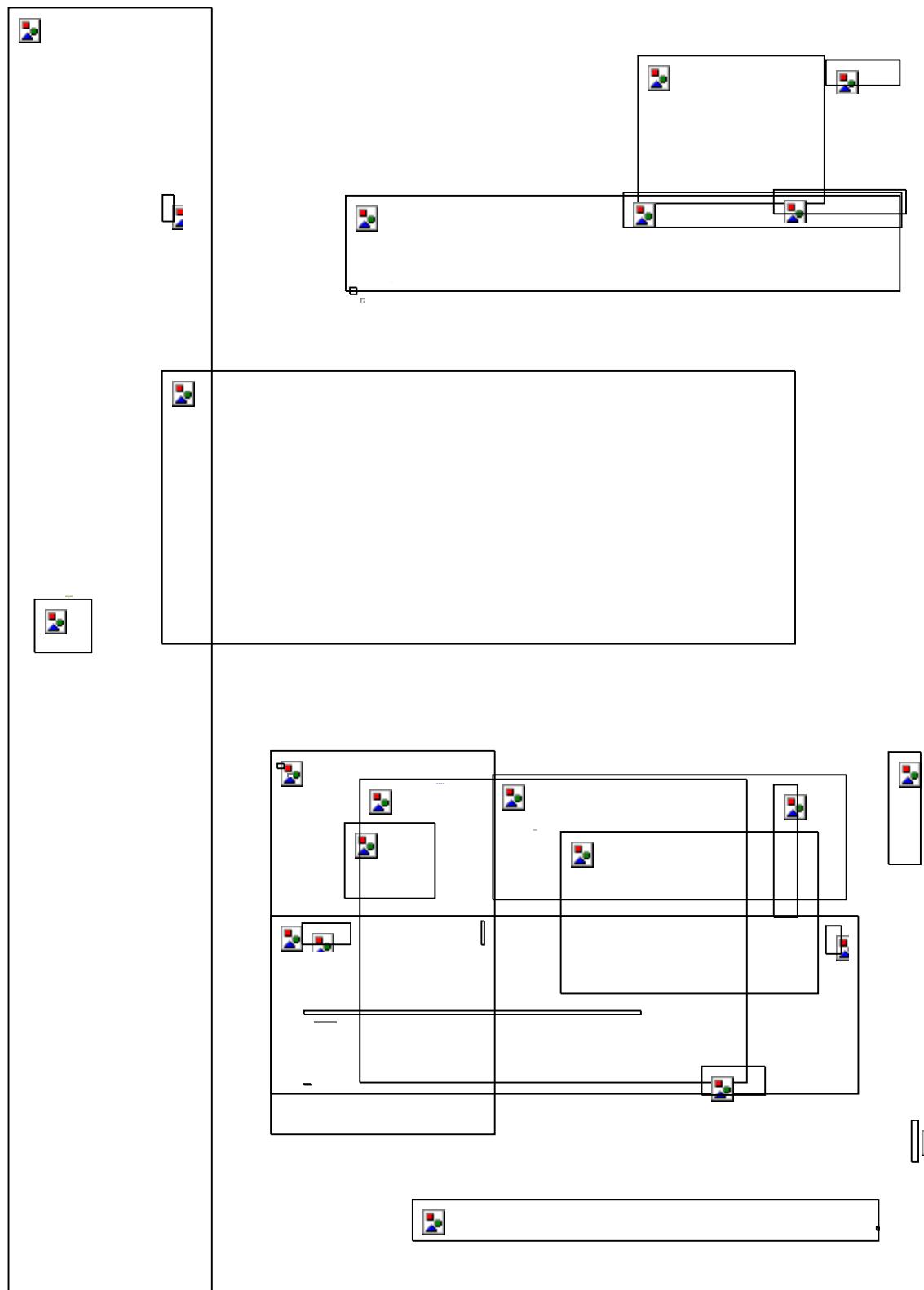


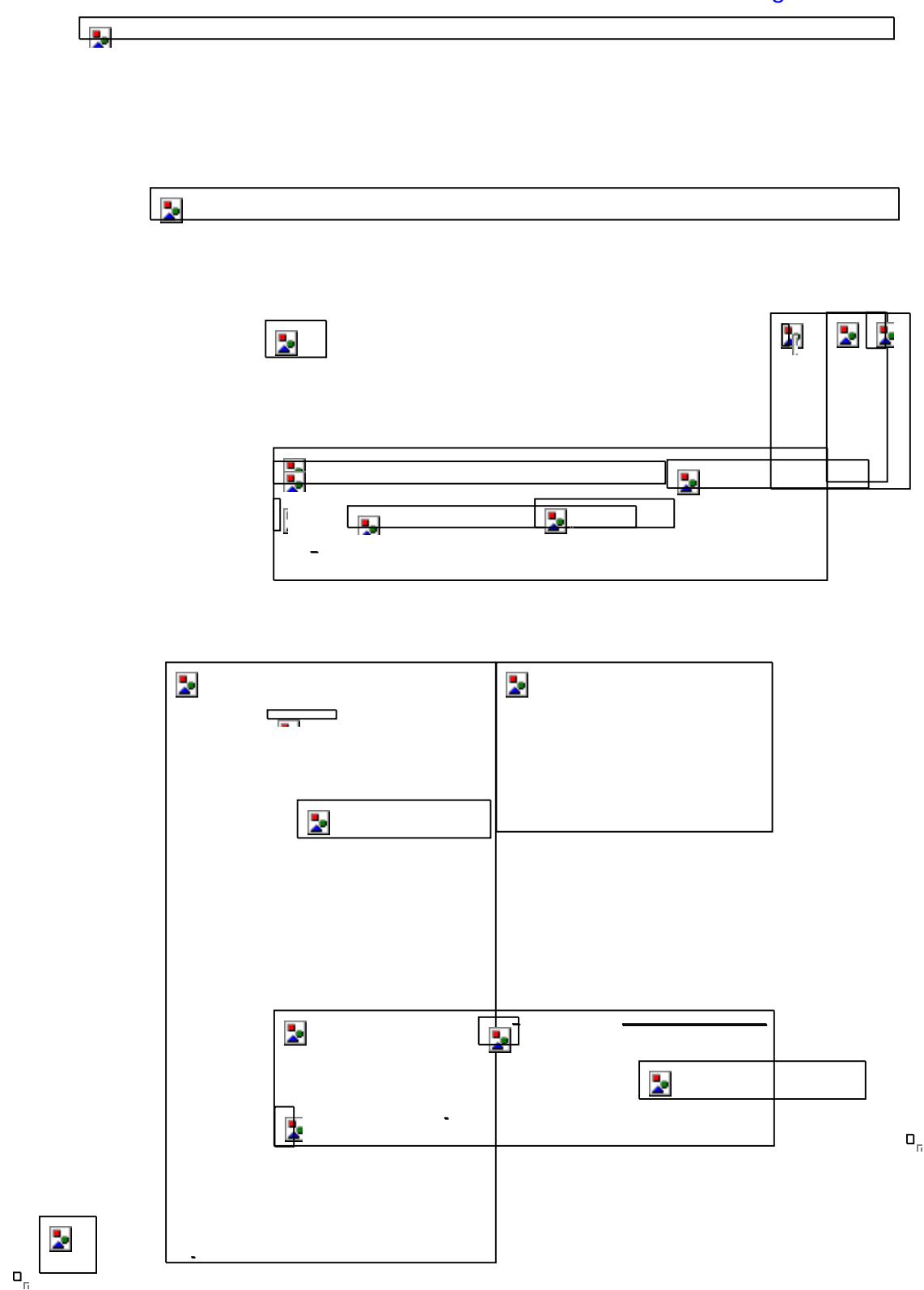


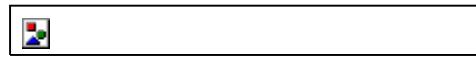
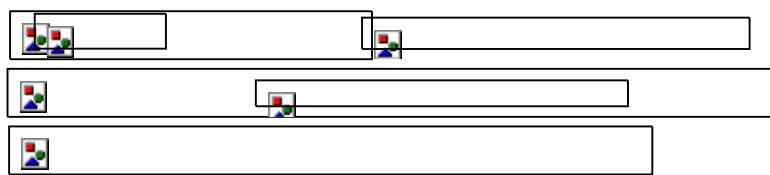
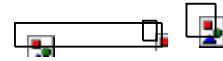
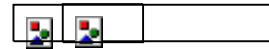
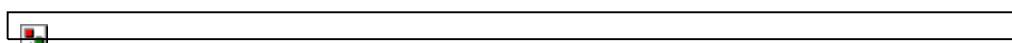


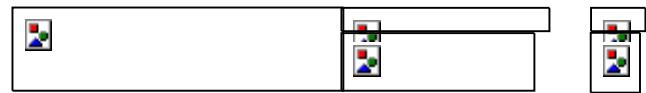


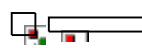
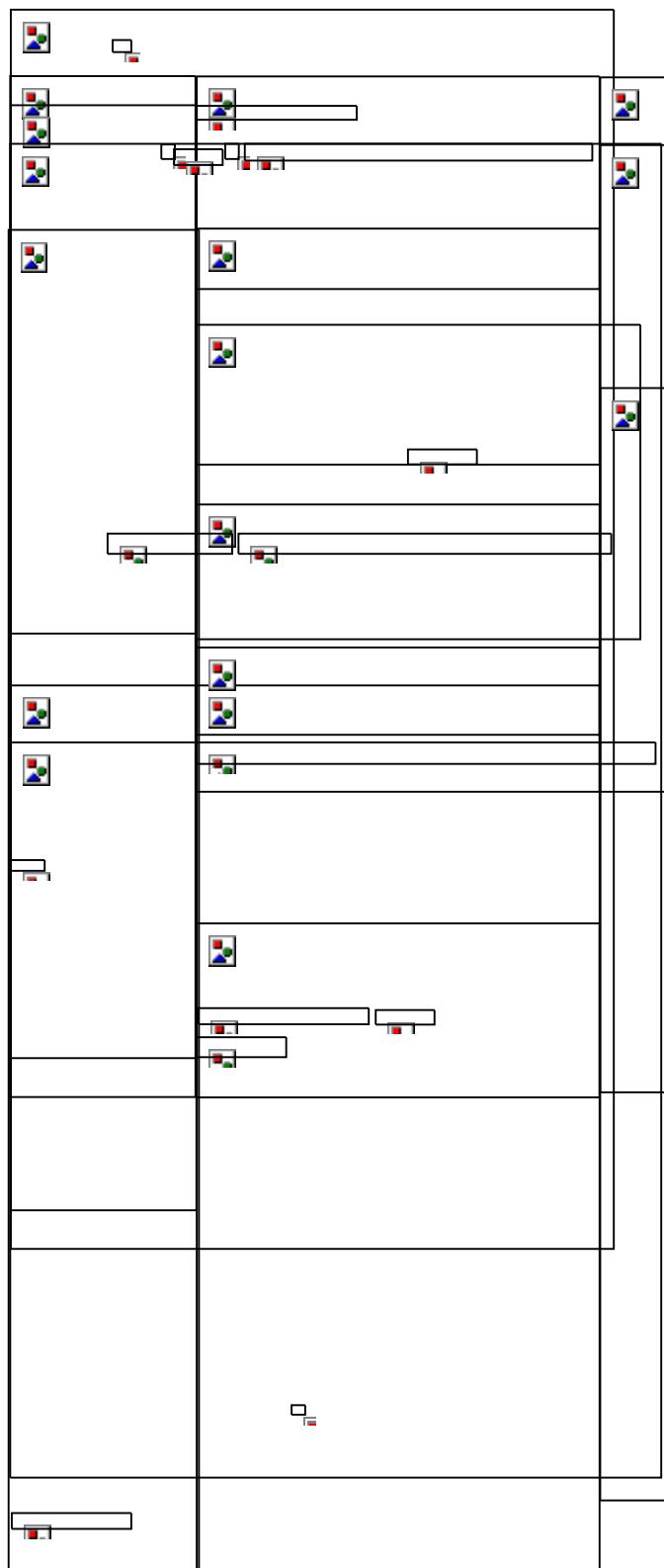




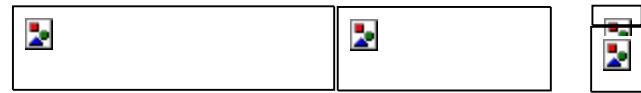


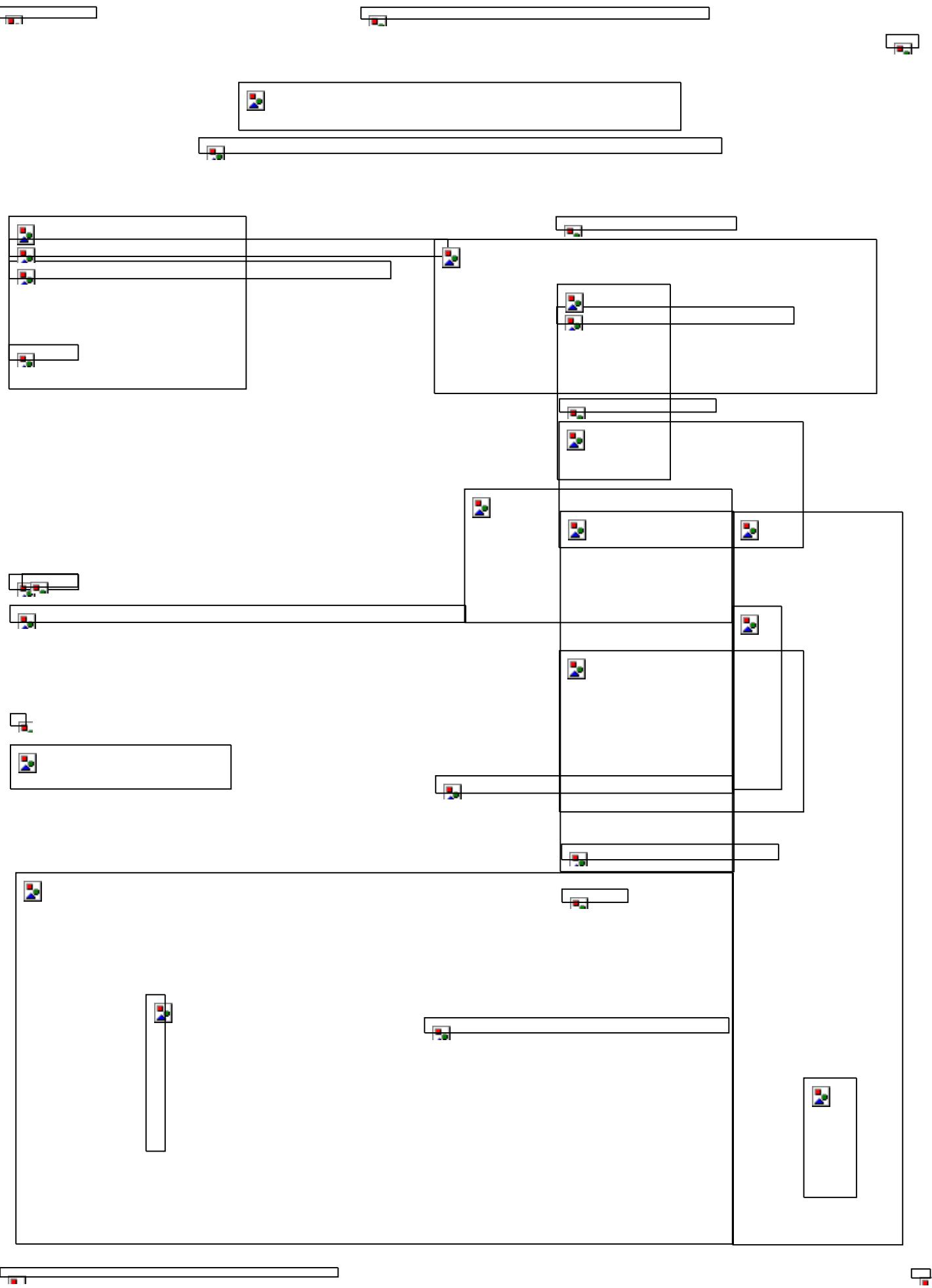


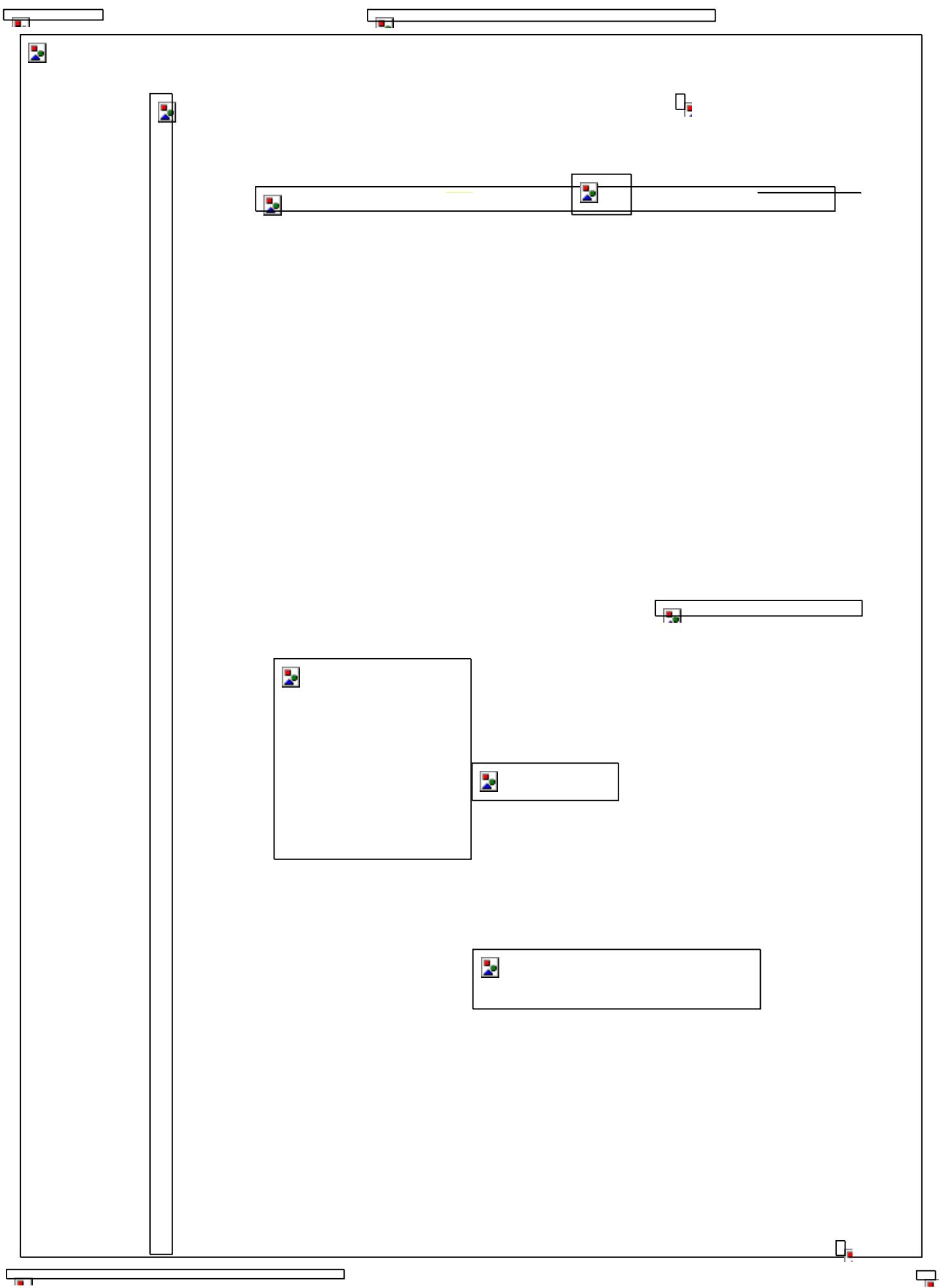


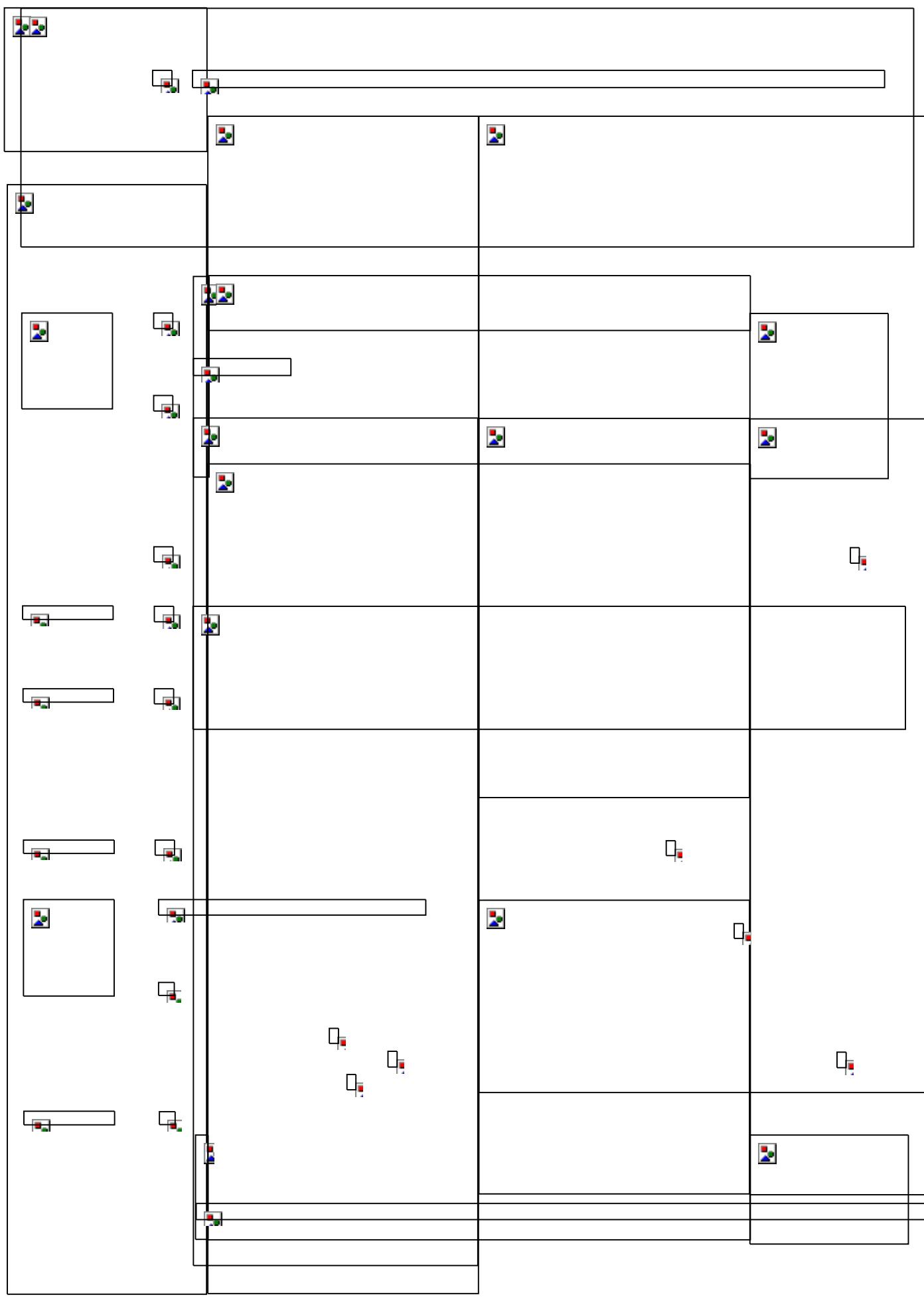


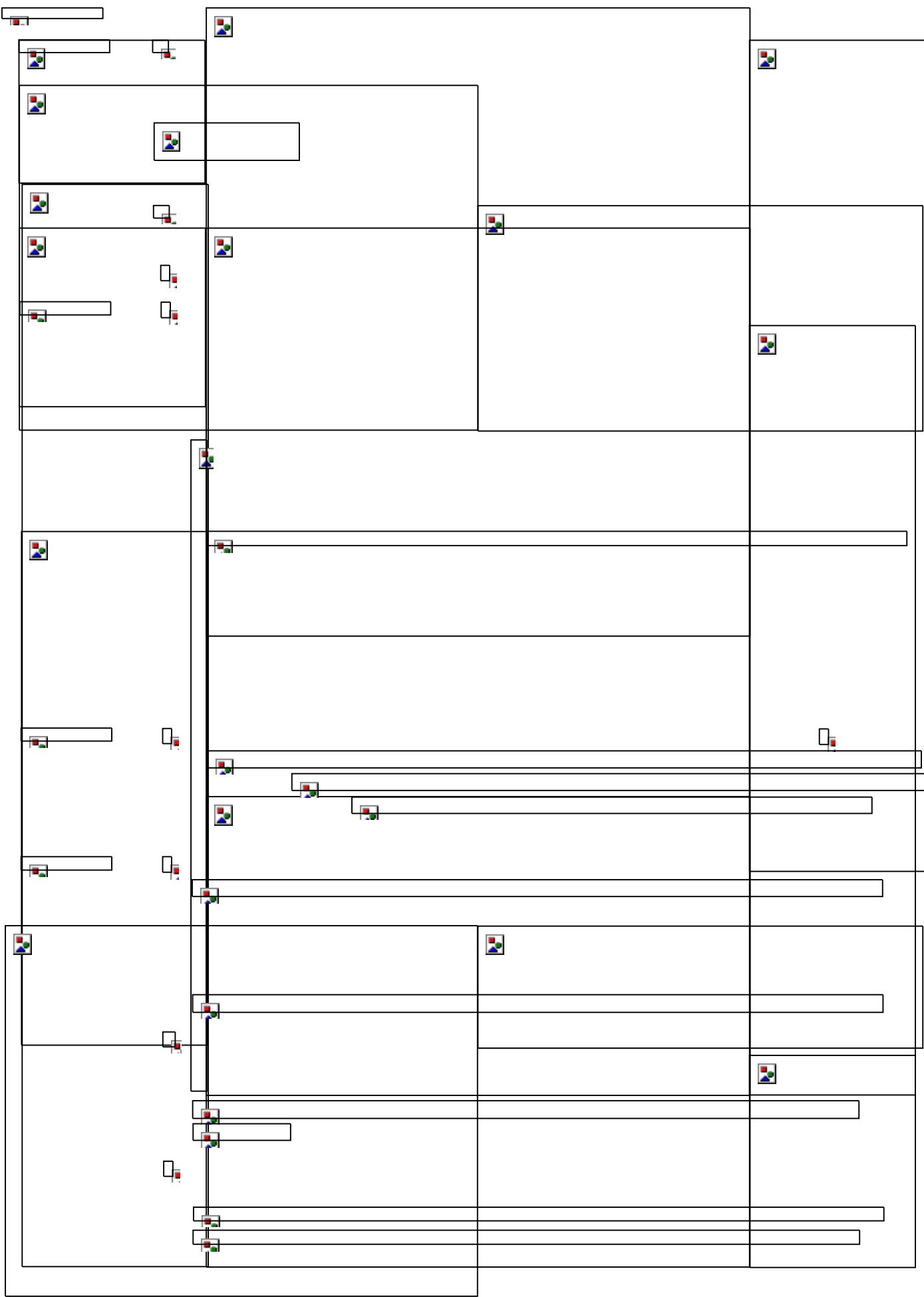
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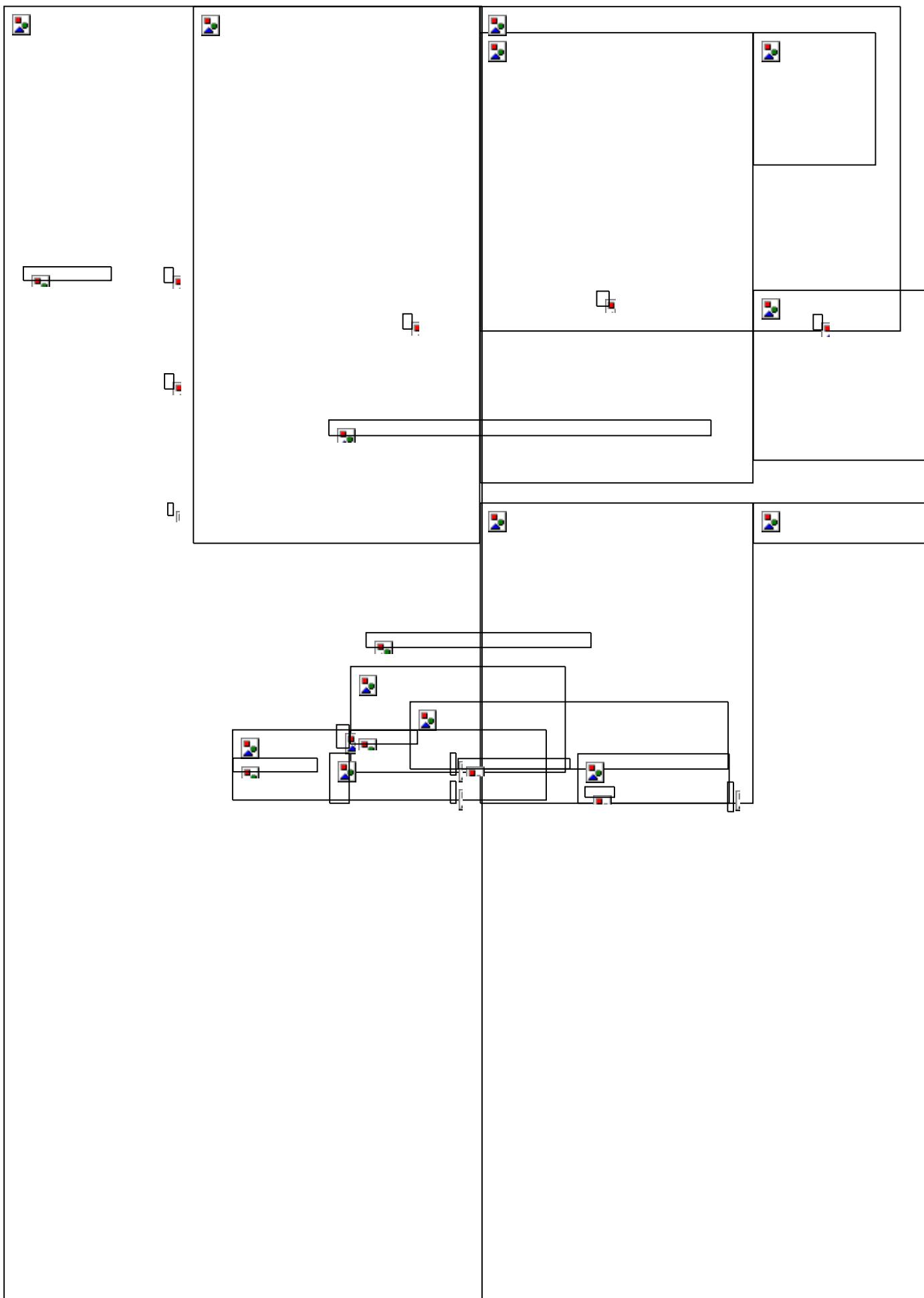


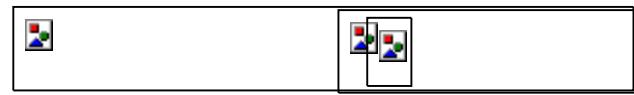


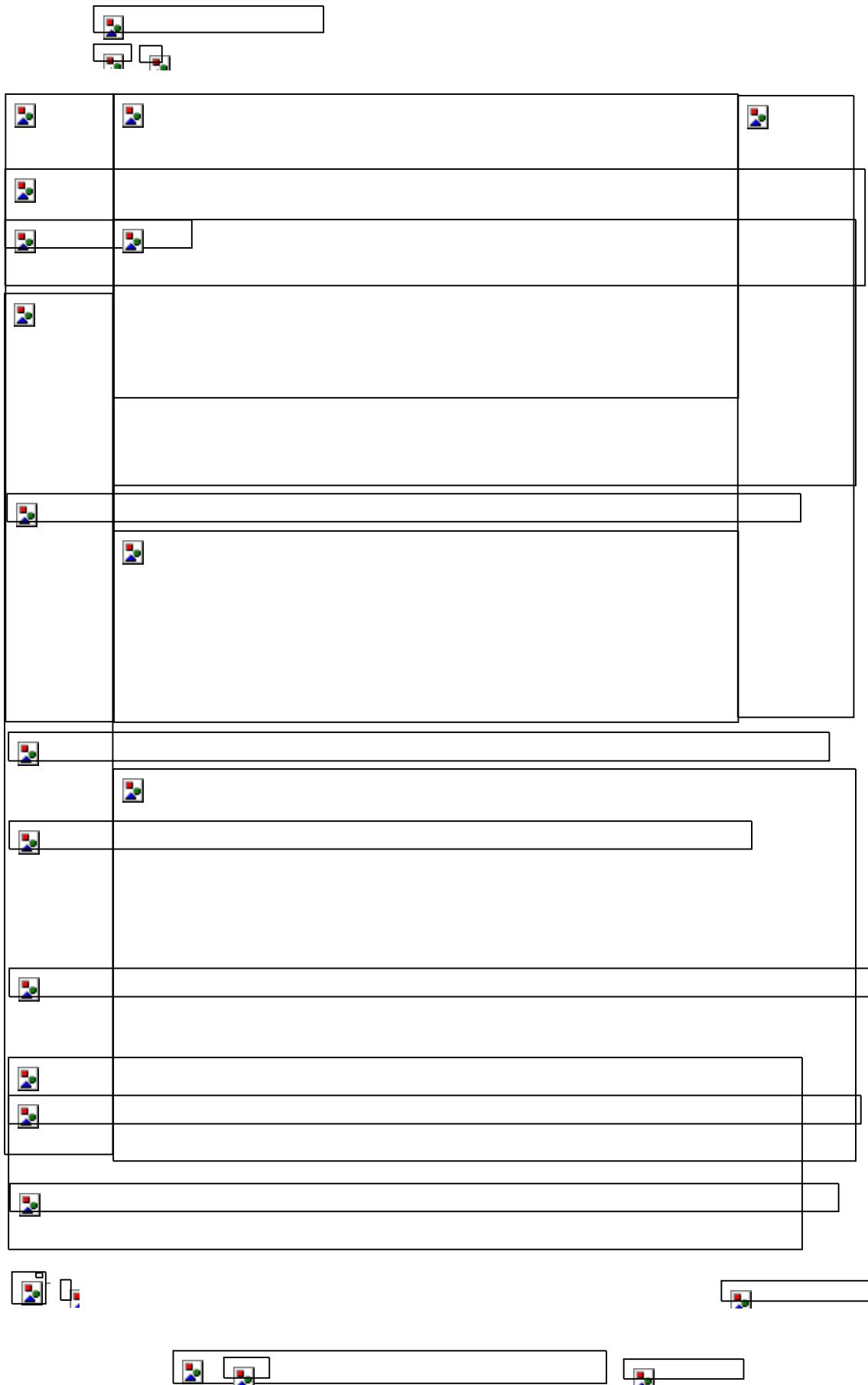




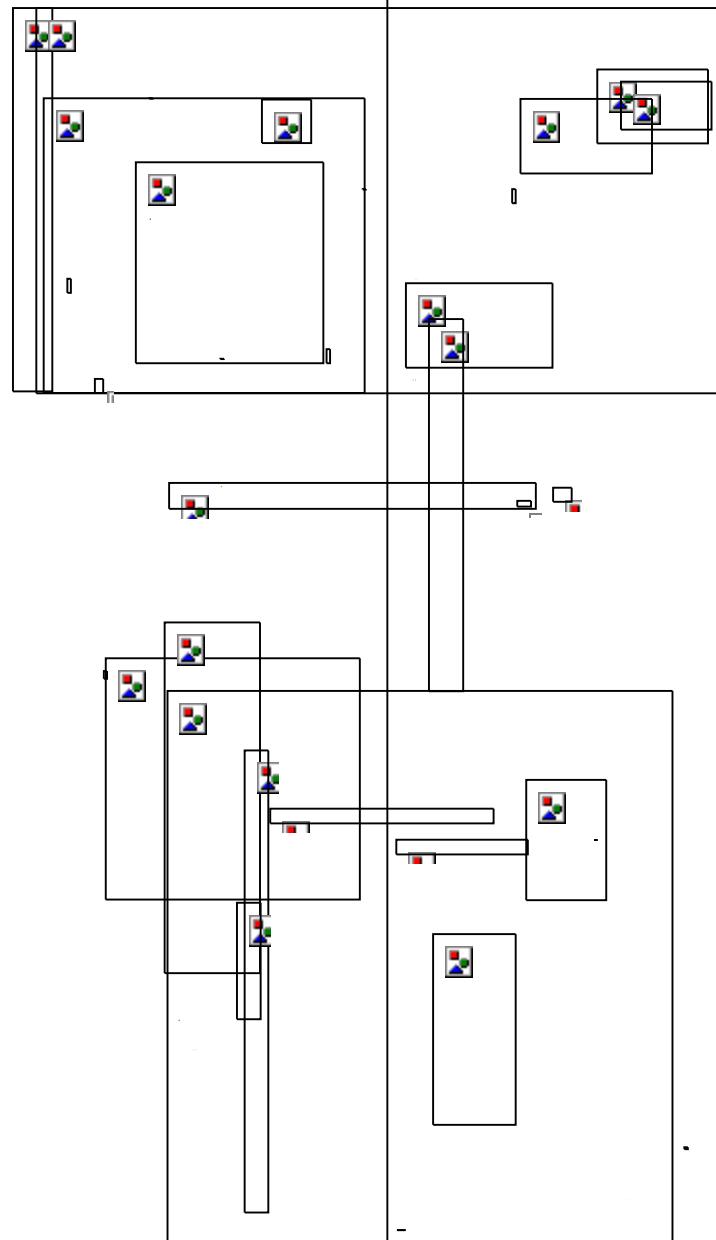


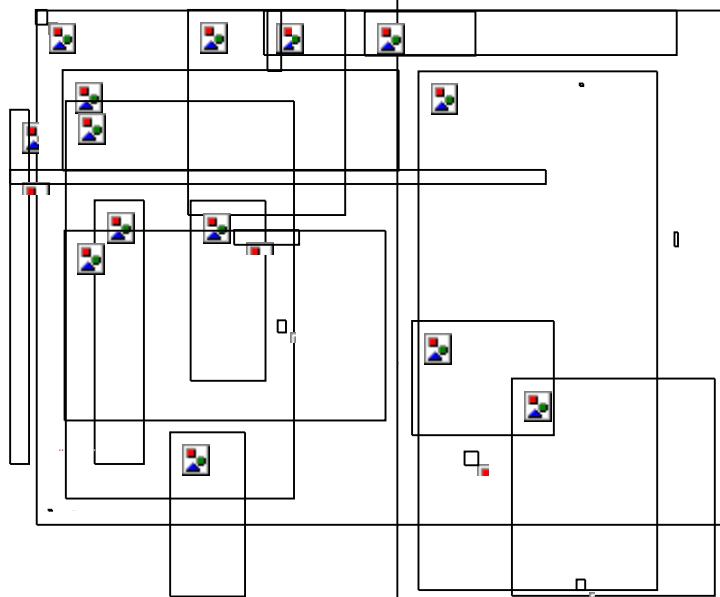




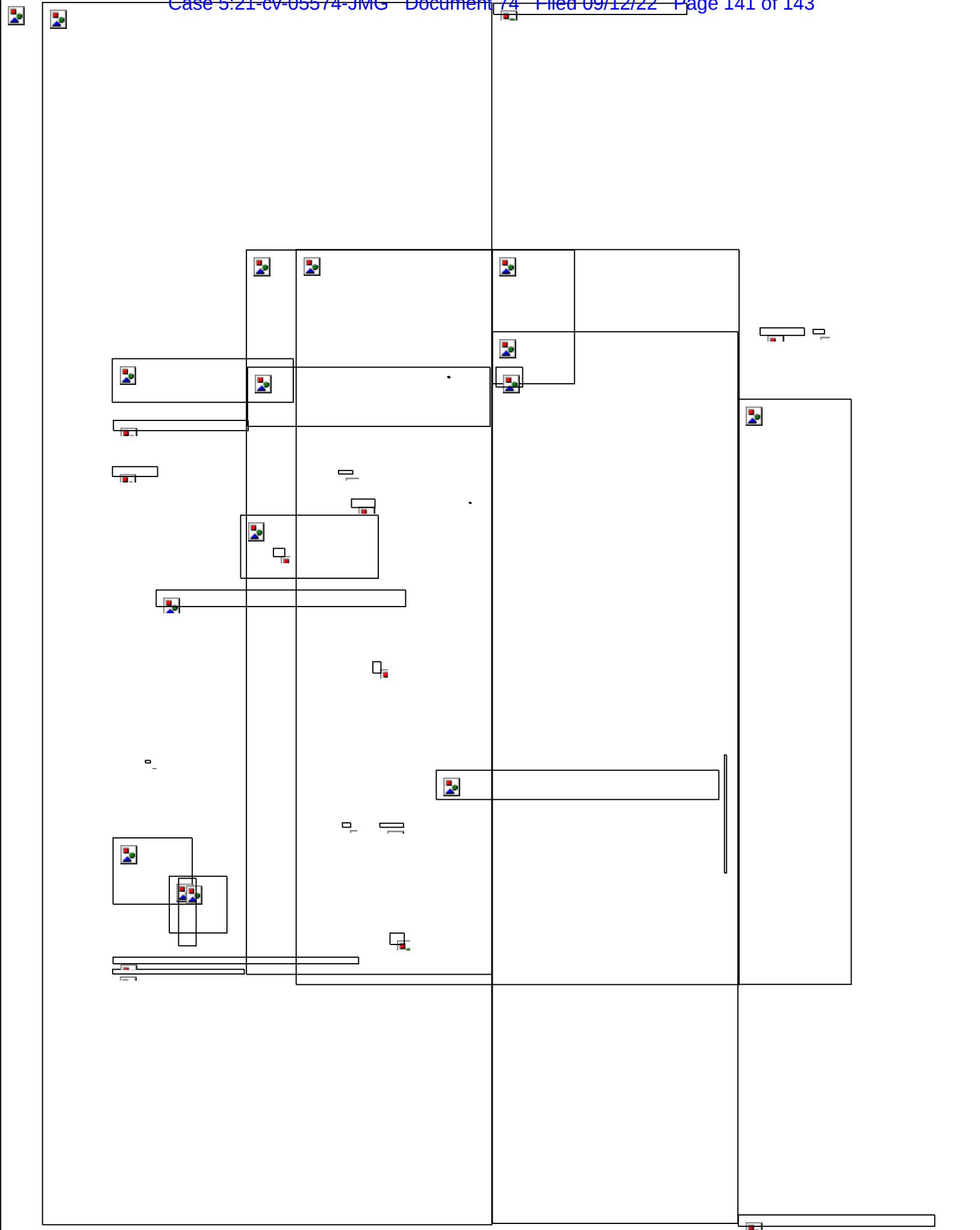












OUTSTANDING LEGAL ISSUES TO BE ADDRESSED AT THE FINAL PRE-TRIAL CONFERENCE

1. Issues of prejudice to Plaintiffs by Defendant and her witnesses testifying to matters and events outside the scope of relevant evidence.
2. Concerns on how Defendant will testify in her own case given she has no lawyer.
3. Concerns on how Defendant will introduce evidence.
4. Concerns regarding Defendant's demeanor in court.
5. Issues of preclusion of evidence addressed in Motions in Limine

TRIAL TIME

Plaintiffs anticipate two to three (2-3) days to put on their case in chief and estimates the entire trial should take four to five (4-5) days.

KOLMAN LAW P.C.

/s/*Timothy M Kolman*
TIMOTHY M. KOLMAN
414 Hulmeville Ave.
Penndel, PA 19047
Telephone: (215) 750 3134
Fax: (215) 750 3138
Client_Care@KolmanLaw.com
tkolman@kolmanlaw.com

Date: September 12, 2022,

Attorneys for Plaintiffs

